# **POOR LEGIBILITY** DUE TO THE QUALITY OF THE ORIGINAL

Correspondence with Government Agencies
6900 Stanford Avenue, Los Angeles, CA
(from General Electric files)

#### BACKLOG SITE CLEANUP PLANNING REPORT

# GENERAL ELECTRIC, (Formerly ENDURA)

## I. Site Information

# A. Location and Type of Site

6900 Stanford Avenue Los Angeles, CA 90001 Los Angeles

The facility was formerly used by General Electric to repair and reprocess transformers. Endura Metals used the site to manufacture stainless steel kitchen and restaurant cabinets and tables.

This site was listed as Endura Metals in the January 1987 Expenditure Plan.

# B. Description of Hazardous Wastes

Polychlorinated biphenyl and polychlorinated dibenzofurans were found at elevated levels at the site. Chlorinated organic compounds have a wide range of central nervous system and respiratory effects, and some are known or suspected carcinogens.

#### C. Threat to Public Health and Environment

The primary threat to the public and the environment is through direct contact.

There is no known exposure at this time. DHS will monitor conditions at this site to detect any change in public health status. If a change in status should occur, DHS will schedule an appropriate response action and notify the Legislature.

The degree of health hazard posed by chemical contamination of a site depends on the concentration of the material present and the duration of exposure. DHS policy is to evaluate all listed hazardous waste sites for the need to take action to abate any acute public health or environmental threats posed by a site. Therefore, the threats described in this document generally represent the potential impact of long-term exposure to specific hazardous substances if: 1) the site is not abated, 2) the substances migrate off site, and 3) the substances at some point come into contact with human or environmental receptors.

## II. Site Status

# A. Status of Site Activity

The County Health Department has requested DHS assistance at the site. General Electric has offered to conduct an additional characterization but has refused to enter into an enforceable agreement.

# B. Projected Revenue Sources

This site is projected for cleanup funded by responsible parties, with reinbursement to DHS for staff and related costs. However, if the responsible parties fail to provide funding for cleanup, another funding source will need to be established.

# III. Cleanup Completion Estimates

The site has a relatively high direct contact score in hazard ranking system score. It may be necessary to initiate interim corrective measures based in part on an August, 1987 recommendation from Los Angeles County Health Department epidemiology staff.

However, final remediation is not scheduled during the next 5 years. Based on current information, this site is projected to be a small site which will require an estimated 1 year and 7.5 months to complete from the date of cleanup initiation. This estimate is subject to change based on receipt of additional information.

This site will be targeted for cleanup in a later edition of the Expenditure Plan based on relative site cleanup priorities at the time of the update. Therefore, no cleanup completion dates have been projected at this time.

Ordering Information:

Toxic Substance Control Division Office of External Affairs P.O. Box 942372 Sacramento, CA 94234



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street San Francisco, Ca. 94105-3901

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pro Aurol

07 AUG 1992

Bart Malloy General Electric Company 275 Battery Street, 23rd Floor San Francisco, CA 94114

Re: Freedom of Information Act Request RIN-9-2433-91

Dear Mr. Malloy:

In response to your Freedom of Information Act (FOIA) request dated October 16, 1992, we wish to inform you that there is no information in the Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) database that is responsive to your request for:

# General Electric/Endura Metals Facility

Pursuant to 40 C.F.R. Section 2.120 (a) (5) (iii), there will be no fee charged for providing the enclosed information.

If you have any questions, please contact Ann Ficher of this office at (415) 744-2349.

Sincerely,

Thomas A. Mix, Chief
Site Evaluation Section

Enclosures



Corporate Environmental Programs General Electric Company 275 Battery Street, 23rd Floor San Francisco, CA 94111 415 274-1900

October 16, 1991

Ms. Ida Tolliver Freedom of Information Officer U.S. Environmental Protection Agency Region 9 75 Hawthorne Street San Francisco, CA 94105

Re: Freedom of Information Act Request

Dear Ms. Tolliver;

Enanc (2730)

Pursuant to the Freedom of Information Act, 5 U.S.C. 552 et seq., I hereby request copies of the following documents and records:

Any and all documents containing correspondence from the Electric Company to the United Environmental Protection Agency (E.P.A.), which the E.P.A. received in 1983 or 1984, regarding the property known as either the General Electric Company or the Endura Metals Facility, at 6900 Stanford Avenue in Los Angeles, CA.

If the Agency determines that some portion of the requested document is exempt from release, I hereby request the release of any portion of the document that is not exempt. In addition, if the Agency determines that any exemption is applicable, I request that the Agency advise me in writing as to what specific documents are being withheld. I also request that the Agency identify any exemption that is invoked and explain why it applies in this case.

I understand that there may be a charge for these copies. If the charge will exceed \$100.00, please telephone me at (415) 274-1900 for approval. If the charge will be less than \$100.00, please send the copies and the bill for the copying to me at the address listed above. Thank you for your assistance in this matter.

> Very truly yours, But Mullay

Bart Malloy

Paralegal

Commercial



Corporate Environmental Programs General Electric Company 275 Battery Street, 23rd Floor San Francisco, CA 94111 415 274 1300

January 29, 19912

California Environmental Protection Agency Department of Toxic Substances Control 1405 North San Fernando Blvd., Suite 300 Burbank, California 91504

> Re: 6900 Stanford Avenue, Los Angeles, California Bond Expenditure Plan, Backlog Site

To whom it may concern:

This letter is to advise the Department of Toxic Substances Control that General Electric ("GE") plans to dismantle and dispose of two buildings and associated site improvements (e.g., asphalt, concrete and railroad tracks near the buildings) presently located at 6900 Stanford Avenue, Los Angeles, California (the "property"). The property currently is unoccupied and GE desires to remove the buildings to eliminate any potential for vagrants and trespassers to enter. In January 1987 the Department of Health Services identified the property as a "backlog site" in the Expenditure Plan for the Hazardous Substance Cleanup Bond Act of 1984. The property is not, nor has it been, the subject of any state or federal enforcement action.

All debris, including the demolished building materials, will be handled and disposed of in accordance with applicable federal, state and local laws. Building demolition is scheduled to begin in February 1992.

If you require any additional information regarding the above-described actions, please contact me at (415) 274-1906.

Very truly yours,

in 1 Baczelle.

Irene A. Boczek



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, Ca. 94105-3901

NOV 13 1991

Jack J. Gilbraith
OHM Corporation
1990 North California Blvd., Suite 400
Walnut Creek, CA 94596

FAX 510 256 6111

Dear Mr. Gilbraith:

This letter is in response to your request for Region 9's guidelines regarding the EPA definition of Quantifiable Level/Level of Detection for PCBs and the use of water as dust suppressant in demolition of a PCB contaminated building.

The EPA considers the level of detection to be 2 ppm for PCBs. This definition can be found in 40 CFR 761.3. For purposes of the TSCA regulations, anything less than 2 ppm is considered non detectable for PCB solids and non aqueous liquids.

You have indicated that you would like to use water as a dust suppressant and to wash dust off the walls of the building. The water must be collected and treated with carbon filtration prior to discharge. Approval should be obtained from the local Regional Water Quality Control Board prior to any discharge. All filters and untreated water must be disposed of as PCB waste per 40 CFR 761.60. All equipment that comes in contact with untreated water must be disposed of per 40 CFR 761.60 or decontaminated per 761.79.

Please note that the above information provides federal guidelines for Region 9. State and/or local guidelines may be more stringent and supersede the recommendations provided above. If you have any questions, please feel free to call me at (415) 744-1119.

Sincerely,

Joe Karkoski

Environmental Engineer

**Toxics Section** 

Air and Toxics Division



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street San Francisco, Ca. 94105

OCT 3 1 1991

Jack J. Gilbraith
OHM Corporation
1990 North California Blvd., Suite 400
Walnut Creek, CA 94596

Dear Mr. Gilbraith:

This letter is in response to your request for Region 9's disposal guidelines for waste generated from the demolition of structures contaminated with PCBs. The anti-dilution rule does apply to spills of regulated amounts of PCBs. The spill clean up policy (40 CFR Part 761.120 et. seq.) requires clean up to 25 ppm for restricted access areas and 10 ppm for non-restricted access areas. Disposal of material contaminated above the clean up goal must be in a TSCA approved chemical waste landfill.

If you do not plan to leave any contaminated material from building demolition in place, you may have the option of choosing a 25 ppm clean up goal. Any material at 25 ppm or greater should go to a TSCA approved landfill. Material at 25 ppm or less should go to a restriced access disposal facility, such as a municipal landfill.

Your 4th question refers to the use of water to cool concrete saw blades. It is not necessary to send the water through carbon filtration between uses. A particulate filter should insure that there is no significant buildup in PCB concentration in the water. The local Regional Water Quality Control Board should be contacted to determine the proper disposal method of the cooling water.

Please note that the above information provides federal guidelines for Region 9. State and/or local guidelines may be more stringent and supersede the recommendations provided above. If you have any questions, please feel free to call me at (415) 744-1119.

Sincerely,

Joe Karkoski

Environmental Engineer

**Toxics Section** 

Air and Toxics Division



# OHM

October 25, 1991

Greg Czajowski(T-5-2)
Pesticides and Toxics Branch
Environmental Protection Branch, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Dear Mr. Czajowski:

I am currently working on a technical specification for the demolition and removal of several PCB contaminated buildings. Prior to 1971, the site was used to service electrical equipment including PCB containing transformers. Certain concrete floor core samples have indicated PCB concentrations ranging from "non-detected" to 4000 parts per million (ppm). A large portion of the building materials contain less than 50 ppm PCBs. The building owner has specified that all work must comply with state and federal regulations. I have several questions for you concerning interpretation of federal regulations and in particular 40 CFR 761.

- Does the anti-dilution rule require that building materials including walls and ceilings containing quantifiable levels of PCBs to be disposed of as if they contain the same concentration as the liquid PCBs (assume liquids contained greater than 500 ppm) spilled on the materials, regardless of their concentration?
- TSCA defines "Quantifiable Level/Level of Detection" for PCBs as 2 ppm. If the level of detection is 2 ppm, are materials that contain less than 2 ppm non-PCB, and therefore not subject to the ant-dilution rule or regulated under TSCA?
- 3) 40 CFR 761.125 (4) (v) requires the cleanup of PCBs in soil to a level of 10 ppm in nonrestricted access areas (PCB Spill Cleanup Policy). Are soils that contain PCBs at concentration greater than 10 ppm and less than 50 ppm required to be disposed of in a TSCA landfill?
- 4) Can water that is used to cool concrete saw blades that contacts PCB contaminated concrete surfaces (assume surface concentrations of PCBs greater than 500ppm) be collected and filtered through activated carbon filter for reuse?

5) If the concentration of PCBs is below the quantifiable limit in the water generated and filtered as described above can the water be disposed as non-PCB?

I would greatly appreciate your answers to the above questions so that we can develop a demolition plan that is consistent with Region IX policy concerning PCB cleanup.

Sincerely:

Jack J. Gilbraith Project Manager



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, Ca. 94105-3901

NOV 13 1991

Jack J. Gilbraith OHM Corporation 1990 North California Blvd., Suite 400 Walnut Creek, CA 94596

08:58 FAX 510 25 6111

Dear Mr. Gilbraith:

This letter is in response to your request for Region 9's guidelines regarding the EPA definition of Quantifiable Level/Level of Detection for PCBs and the use of water as dust suppressant in demolition of a PCB contaminated building.

The EPA considers the level of detection to be 2 ppm for PCBs. This definition can be found in 40 CFR 761.3. For purposes of the TSCA regulations, anything less than 2 ppm is considered non detectable for PCB solids and non aqueous liquids.

You have indicated that you would like to use water as a dust suppressant and to wash dust off the walls of the building. The water must be collected and treated with carbon filtration prior to discharge. Approval should be obtained from the local Regional Water Quality Control Board prior to any discharge. All filters and untreated water must be disposed of as PCB waste per 40 CFR 761.60. All equipment that comes in contact with untreated water must be disposed of per 40 CFR 761.60 or decontaminated per 761.79.

Please note that the above information provides federal guidelines for Region 9. State and/or local guidelines may be more stringent and supersede the recommendations provided above. If you have any questions, please feel free to call me at (415) 744-1119.

Sincerely,

Joe Karkoski

Environmental Engineer

Toxics Section

Air and Toxics Division

DEPARTMENT OF HEALTH SERVICES 107 SOUTH BROADWAY, ROOM 7011 LOS ANGELES, CA 90012 (213) 620-2380



copy mailed to: Debbi Hankins

4/27/88

with note: For your information.

APR 20 1988

April 20, 1988

William P. Thornton, Jr., Counsel Utility & Industrial Sales & Service Division General Electric Company One River Road Schenectady, NY 12345

Dear Mr. Thornton:

GENERAL ELECTRIC COMPANY (GE), STANDFORD AVENUE SITE

As discussed in our initial meetings, the Department cannot allocate staff resources for project oversight unless GE enters into a Consent Order which includes an up-front funding provision.

The revision of the Remedial Investigation/Feasibility Study workplan was received on April 18, 1988. However, as discussed above, the status of the subject site shall remain as "back log" in the Bond Expenditure Plan (back log sites are those the Department cannot address with staff resources in the next 5 fiscal years).

If you have any questions or comments, please contact Jean Liu of this office.

Sincerely,

Nestor O. Acedera, Unit Chief Assessment & mitigation Unit Southern California Section

Toxic Substances Control Division

DEPARTMENT OF HEALTH SERVICES

FEB 24 1988

107 SOUTH BROADWAY, Rm 7011 LOS ANGELES, CALIFORNIA 90012 (213) 620-2380



February 4, 1988

William P. Thornton, Jr. Counsel Apparatus Service Department General Electric One River Road Schenectady, NY 12345



Dear Mr. Thornton:

COMMENTS AND RECOMMENDATIONS ON GE'S REMEDIAL INVESTIGATION/FEASIBILITY STUDY (RI/FS) WORKPIAN

Please find enclosed the Department's comments and recommendations on the subject workplan.

The revision of the workplan and the Site Safety Plan should be submitted to the Department and Los Angeles County Environmental Health within 30 days of the date of this letter.

If you have any questions, please contact Jean Liu of this office.

Sincerely

Nestor O. Acedera, Unit Chief
Assessment & Mitigation Unit
Southern California Section
Toxic Substances Control Division

cc: K. E. Barr Bechtel Environmental, Inc. P.O. Box 3695 San Francisco, CA 94119

> Larrie L. Lance, DrPH, Epidemiologist Toxic Epidemiology Program Los Angeles County Department of Health Services 2615 South Grand Ave., 6th Floor Los Angeles, CA 90007

Enclosure

# Memorandum

To : Nestor O. Acedera

Via: Jim Smith

Date : February 4, 1988

Subject: GE Site, 6900 Stanford Averue, in Los Angeles

From : Jean Liu, Project Officer

GE Stanford site is listed in the Bond Expenditure Plan as a backlog site. The site was brought to the Department's attention by the epidemiology program of Los Angeles County. This office re-evaluated the previous data and agree with the County that it is necessary to further investigate the site. Since the decision was made, we drafted a consent order hoping GE will provide up-front funding to facilitate staff hours. However, the consent agreement was not achieved.

GE retained Bechtel Environment Inc. (BEI) to prepare a Remedial Investigation/Feasibility Study (RI/FS) workplan. The workplan was transmitted to the Department on October 22, 1987. The Health and Safety Plan (Appendix C) portion of the workplan was reviewed by John Danby, staff industrial hygienist. His comments are attached with this memo. I reviewed the workplan, comments and recommendations are as follows:

- On page 2-2, it is stated that previously identified contamination was limited to the top 10 feet. There is no data in Appendix A (Summary of Data) to support this conclusion. BEI should provide clarification regarding this statement.
- 2. Appendix A: BEI should provide better summary of the previous sampling data. Sampling date, location, depth and personnel should be clearly indicated on the summary page. Fifty (50) parts per million (ppm) of polychlorinated biphenyl (PCB) is not a cut-off point. All of the analytical results and data points should be mapped out by substance (i.e. PCB, dioxin/furan, etc). It is equally important to prove and disprove contamination in one area, so sample points with low or no contamination should be indicated as well.
- 3. Page 2-2 states that ground water appears to be a relatively minor pathway due to the depth of water and the probable immobility of PCB.

BEI should keep in mind that the site has been in operation since 1942. Over the years, solvents and other chemicals might have spilled at the site. Previous analyses were limited to PCBs and dioxin/furan. A more thorough investigation of the exact nature and extent of contamination is necessary. HEI recognizes ground water as a "relatively minor" pathway on the basis of partial information. Therefore, more comprehensive assessment may show that the conclusion drawn on page 4-3 (no further investigation of ground water is necessary) is incorrect.

In order to investigate ground water conditions, piezometer (short screen monitoring wells) clusters are recommended. Well casing material should be stainless steel.

4. On page 3-5, it is stated that Med-Tox collected airborne samples from July 1984 to March 1985. Those samples had concentrations below detection level.

The data will be useful only after identifying the types of particulates tested, the meteorological information (such as wind direction, moisture content, etc.) and locations. BEI should provide all information necessary to evaluate the potential migration of contamination in air.

5. Page 3-3 of the workplan summarizes the analyses for dioxin/furan and concludes that no further investigation is required in the two buildings because PCB, dioxin and furan levels are below the "limits" used by this Department.

BEI should note that although 2, 3, 7, 8 tetra chlorodibenzodioxin (TCDD) was detected at less than one part per billion (ppb), other dioxin/furan isomers were detected at much higher levels. Recent studies compare the toxicity of other dioxin/furan to 2, 3, 7, 8 TCDD and assume a toxicity equivalence factor (TEF). As indicated in the attached, this Department considers all isomers of tetra and penta CDD and CDF chlorinated in the 2, 3, 7, 8 positions to be as toxic as 2, 3, 7, 8 TCDD.

6. Some pages in the workplan need either better copies or clarification (explanation).

## For example:

It is impossible to differentiate between boring locations and previous sampling results of PCB greater than 50 ppm on figure 2.1 in Appendix B.

The two pages proceeding to Appendix B need better copies and explanation.

A table following Med-Tox's letter is unreadable in Appendix A.

Appendix A needs to be arranged in a more logical way. For example, figure 4 and figure 5 should immediately follow table 5. The data reduction, interpretation and summary must be thorough, complete, accurate and logical.

If you need any additional information, please give me a call.

 $JL:\infty$ 

TABLE 8.1.6.3 - 2

# TOXICITY EQUIVALENCE FACTORS FOR PCDD AND PCDF<sup>(1)</sup>

HOMOLOGUE CLASS	EQUIVALENCE FACTOR(2)
Tetra CDD	1.00
Penta CDD	1.00
Hexa CDD	0.03
Hepta CDD	0.03
Octa CDD	0.00
Tetra CDF	1.00
Penta CDF	1.00
Hexa CDF	0.03
Hepta CDF	0.03
Octa CDF	0.00

<sup>(1)</sup> As described in "Health Effects of 2.3.7.8- Tetrachlorodibenzo-p-dioxin and Related Compounds". (Scenario 4). California Department of Health Services. Epidemiological Studies Section. December 27, 1985

<sup>(2)</sup> TEF values apply only to isomers within a homologue class that are chlorinated in the 2.3.7.8 position

# Memorandum

· To

Jean Liu

Date

3 December 1987

Subject:

GE Stanford Avenue Site Safety Plan

From

John Danby

I have completed my review of the subject plan, which was prepared by Bechtel Environmental, Inc. The plan is not too bad, but there are several areas that require attention. The comments below are keyed to the draft TSCD "Site Safety Plan Outline and Guidance for Site Assessment or Site Mitigation Projects" ('Guidance Document'), a copy of which is attached for reference.

- 1) FACILITY BACKGROUND- Good.
- 2) KEY PERSONNEL AND RESPONSIBILITIES- Good.
- 3) <u>JOB HAZARD ANALYSIS</u>- Health hazards associated with PCB exposure should be discussed (see Guidance Document). Issues associated with the potential for heat stress should be addressed, including symptoms, action levels and monitoring.
- 4) RISK ASSESSMENT SUMMARY- N/A
- 5) EXPOSURE MONITORING PLAN- The activities currently planned do not appear to represent a significant exposure problem. However, if the activities are modified (relative to the 9/87 workplan submittal), consideration should be given to real-time particulate monitoring and possibly personal monitoring for particulates and vapors. Although it is generally accepted that PCB vapors are not an exposure issue due to the low vapor pressure, Jim Neely of Ecology and Environment has done some field studies that indicate breathing zone vapors may be much higher than anticipated when activities that significantly disturb the matrix (i.e., excavation) are undertaken.
- 6) <u>PERSONAL PROTECTIVE EQUIPMENT-</u> Describe respiratory protection program (may use corporate plan as addendum). Additional specific information is required regarding the various proclo ensembles that may be in use at the site (situation/operation specific). Note that neoprene gloves are not typically used for PCB work; milled nitrile or viton may be more appropriate.
- 7) WORK ZONES AND SECURITY MEASURES. It would appear that the characteristics of the site are well-enough established that work zones can be described in the plan (include site map).
- 8) <u>DECONTAMINATION PROCEDURES-</u> Inadequate. Please see Guidance Document.
- 9) GENERAL SAFE WORK PRACTICES- Adequate.

- 10) <u>STANDARD OPERATING PROCEDURES-</u> None listed. Suggest decon and fit-test procedures be shown.
- 11) <u>CONTINGENCY PLANS</u>. Include map of route to hospital with directions. Need facility map with evacuation routes. What will be used for warning/evacuation signals? Where is the nearest phone?
- 12) TRAINING REQUIREMENTS- Site specific program is good. What is the content of the 29CFR1910.120 training session?
- 13) MEDICAL SURVEILLANCE PROGRAM- Good.

Please let me know if you have any questions.

JD:jd

Attachment

# SITE SAFETY PLAN OUTLINE AND GUIDANCE FOR SITE ASSESSMENT OR SITE MITIGATION PROJECTS

# Toxic Substances Control Division

This document is intended to assist contractors and responsible parties in preparing site safety plans (SSP's) for Toxic Substances Control Division projects. This guidance is not necessarily all-inclusive. The type of plan required and its content will vary on a site-specific basis. However, most SSP's will need to address, at a minimum, all of the topics listed in the SSP outline below. If a topic area does not relate to the project, a negative declaration should be included to establish that adequate consideration was given to the topic.

A well-written SSP should be a stand-alone document that serves several purposes. While assuring the governmental agencies involved that both worker and community health and safety concerns are properly addressed, it should also provide site management with information that is sufficiently detailed to permit implementation of all health and safety functions at the site. A reference copy of the SSP must always be available at the site for this purpose. The SSP must also provide site workers with appropriate health and safety guidance, and be useful for training the workers in the hazards specific to the particular job.

It is advisable to have the SSP developed by industrial hygiene and safety professionals who have hazardous waste site experience. It is imperative that 29 CFR 1910.120 ("Hazardous Waste Operations and Emergency Response; Interim Final Rule; Federal Register Vol. 51, pp.45654 - 45675, 12/19/86) be consulted while preparing an SSP. All SSP requirements of this regulation are reflected in this guidance document. A suggested reference for use in preparing SSP's is the NIOSH/OSHA/USCG/EPA "Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities", October 1985, DHHS (NIOSH) Publication No. 85-115; this reference is cited in the Interim Final Rule.

While the SSP should be detailed yet concise, most importantly it must be <a href="site-specific">site-specific</a>. Be advised that generic "boiler-plate" language is frequently rejected if it does not reflect conditions at the site. In particular, photocopied or regurgitated EPA guidance material on topics such as levels of protection, decontamination protocol, or work zone criteria will not be accepted without information on how such items will be implemented for the project at hand. Be advised that the project will be audited for compliance with the SSP by a TSCD industrial hygienist; therfore, the site safety protocol should be accurately presented in the SSP.

#### I. SSP Outline

- 1. Facility Background
- 2. Key Personnel and Responsibilities
- 3. Job Hazard Analysis
- 4. Risk Assessment Summary

- 5. Exposure Monitoring Plan
- 6. Personal Protective Equipment
- 7. Work Zones and Security Measures
- 8. Decontamination Procedures
- 9. General Safe Work Practices
- 10. Standard Operating Procedures
- 11. Contingency Plans
- 12. Training Requirements
- 13. Medical Surveillance Program
- 14. Documentation

# II. Guidance Information

# 1. Facility Background

If the SSP is not an integral part of the workplan, this section of the SSP should be devoted to a description of the project, including field activities and goals. Further, it should include a summary of information regarding wastes disposed of on-site, location and physical state of wastes, chemical characteristics of wastes, and range of concentrations found to date by matrix. Condensed SSPs that are used for training and quick reference should also contain this information.

# 2. Key Personnel and Responsibilities

Identify key personnel by name (if known) and specific assignment for the project (i.e., Joe Smith, Project Manager; Harry Jones, Site Safety Officer, etc.). Summarize the health and safety responsibilities of each key person identified. Include the reporting relationships of all personnel, the extent of the Site Safety Officer's (SSO) authority to correct health and safety problems, the overall project responsibilities of the SSO, and the SSO's qualifications. Also include the telephone numbers of key contractor/responsible party and agency personnel.

# 3. Job Hazard Analysis

This section is necessary to provide summary information on potential hazards to workers at the site. Describe potential chemical hazards based on contaminants present or expected, and the primary health risks associated with each; include PELs/TLVs/RELs for each contaminant (If available). Completely describe the physical hazards associated with each site activity (i.e., trenching, drilling, sampling) and the steps to be taken to minimize these hazards.

Provide anticipated weather conditions, including historic mean temperatures and relative humidities. If heat stress potential is indicated (ambient temp>70F), discuss its monitoring and control (see Sec. 5). In colder regions, give consideration to cold stress potential.

Where trenching or drilling will be conducted, ensure that Underground Service Alert (USA) is contacted for guidance regarding underground utilities. Article 6 of the Construction Safety Orders (in Title 8, California Administrative Code) contains specific regulatory requirements for trenching operations.

Some large/prolonged/complex site mitigation projects will require a more detailed job hazard analysis for each job classification on the project.

# 4. Risk Assessment Summary

Provide a summary of the potential risks/impact on receptors at or near the site. This will include impact on workers, nearby/surrounding community, and environment. This section is very dependent on the availability of data and specifics regarding the site; therefore, based on the phase of the project (i.e., initial site assessment) it may not be possible to include this information.

# 5. Exposure Monitoring Plan

Describe area, worker and community exposure monitoring programs. Exposure hazards to consider include airborne vapors, gases and particulates, radiation, heat stress, and noise. Describe rationales, methodologies, equipment calibration procedures for each program, and locations for area and community monitoring. Include decision matrices for action level determinations. Depending on the geographic location of the site, area and community monitoring of the site may not be applicable. If the operation requires a local air quality agency permit which outlines community air monitoring criteria, provide a copy of the permit as an appendix.

# 6. Personal Protective Equipment (PPE)

Discuss protective clothing and respirator selection. This must be more specific than "chemical resistant" coveralls, gloves, etc., and should include rationale for selection.

For respirator use, include odor threshold of gases and vapors, vapor pressure, and PEL/TIV/REL of each hazardous constituent of primary concern, as well as action levels for upgrade or downgrade.

The section should include a list of PPE selected for each job classification at the site if there are different levels of protection being specified.

# 7. Work Zones and Security Measures

Provide a site and area map with work, contamination reduction and support zones outlined. Indicate decontamination area. Define site

control/security measures; these include items such as fencing, locked gates, security guards, flagging, etc.

# 8. Decontamination Measures

This section will describe decontamination procedures to be used for personnel, personal protective equipment, sampling equipment and heavy equipment. Detail the decon procedures, including how the decon line and rest area will be set up, provisions for disposal of contaminated materials and liquids, and a listing of decon equipment and solutions that will be used (i.e., soap and water, steam cleaner, etc.). Describe the protocol as it will be used on the site; do not submit photocopies of procedures from EPA and other guidance manuals.

#### 9. General Safe Work Practices

This section should describe safe work practices that will be employed at the site, and will address issues such as personal hygiene, drill rig safety, trenching safety, and site entry protocol.

# 10. Standard Operating Procedures

This section should establish Standard Operating Procedures (SOP's) for activities that can be standardized due to their repetitive nature; examples are decontamination protocol and respirator fit test procedures. A checklist is advisable because it is useful in the field for daily checks of working conditions. If such safety SOP's are provided through a corporate health and safety program/manual, that section of the manual should be provided as an appendix to the SSP.

# 11. Contingency Plans

This is another section of the SSP which is very dependent on the specifics of the site and the phase of the project. At a minimum, it should describe medical and emergency services to be used, including a list of emergency contact telephone numbers and the route to the nearest emergency room. Personnel with current CPR/First Aid training need to be identified. Decontamination requirements for personnel injured or exposed in the work zone will be provided.

As applicable, based on the project, develop contingency plans for on-site and off-site spills or releases of hazardous materials which will include evacuation plans for the site and surrounding areas.

#### 12. Training Requirements

This section should describe personnel training programs, which should include as a minimum, health hazard recognition training, physical agent

(safety) training, respiratory protection training, equipment training, safe work practices, first aid/CPR, and personal hygiene. Particular attention must be given to the training requirements set forth in 29 CFR 1910.120. Procedures for daily/pre-shift tailgate safety meetings should be discussed.

Note that Cal-OSHA requires specialized training be given when handling specific materials, and that personnel are trained in the hazards specific to their job.

If the details on such a training program are provided through a corporate health and safety program/manual, the appropriate section should be included as an appendix to the SSP. The SSP should include training needs specific to the project that are over and above the basic corporate program.

# 13. Medical Surveillance Program

Any contractor/subcontractor who has employees working at hazardous waste sites shall have an established medical surveillance program in place that meets the criteria of 29 CFR 1910.120 (f). If such a program is included in the corporate health and safety program, it should be included as an appendix to the SSP. However, appropriate tests or examinations for acute exposures to specific potential hazards from the work at hand should be discussed in this section of the SSP.

## 14. Recordkeeping

There are many requirements in both Cal-OSHA and Federal OSHA regulations covering recordkeeping. Such items include worker exposure monitoring, medical surveillance, training, respiratory protection, and injuries/illnesses. Standard formats for these requirements should be established and be included in the SSP.

# III. Resources

The TSCD staff includes industrial hygienists in each Regional Office who are available to assist, but not function as consultants, in the development of SSP's. The primary responsibility for the development and implementation of the SSP lies with the contractor/responsible party. However, the TSCD industrial hygienists are responsible for review and approval, prior to any site activities, of the SSP and any other health and safety considerations for a specific project. Verbal communications between the parties preparing the SSP and TSCD industrial hygienists is encouraged as this usually results in more expeditious approval of the SSP, which will then decrease the waiting period before site activities can begin.

TSCD SSP Guidance Document

-6-

4/22/87

In terms of written materials, the EPA provides additional guidance documents regarding site safety and SSP development.

Contractors who are working directly for the TSCD should consult their contracts or task orders for items which may be required in an SSP over and above the basic requirements detailed in this document.

#### DEPARTMENT OF HEALTH SERVICES

107 SOUTH BROADWAY LOS ANGELES, CALIFORNIA 90012



HH 2 5 1987

July 9, 1987

William P. Thornton, Jr., Counsel Apparatus Service Department General Electric Company One River Road Schenectady, N.Y. 12345

Dear Mr. Thornton:

The Department is somewhat disappointed with your June 15, 1987 response to our offer to enter into an enforceable agreement pursuant to California Health & Safety Code Section 25355.5 (a) (1) (c). The tone of your response varies considerably from General Electric's previous cooperative position.

The proposed agreement is not, as you suggest based on "carrot and stick" principles. Rather it serves as a notice that if G.E. fails to address site remediation in accordance with California law, the Department will do so. This process is not intended to be an adversarial one. Should G.E. choose not to cooperate, the Department may undertake remediation. G.E. will have opportunity to seek binding arbitration on the issue of allocation of responsibility. G.E. may chose to dispute the Department's claims for costs at the appropriate time.

Meanwhile, the Department appreciates and accepts your offer to submit a site characterization workplan within 90 days of this date. As you point out, this informal agreement is not in lieu of an order or enforceable agreement. Considering G.E.'s past work and familiarity with the site, we believe that the 90 day deadline can be easily bettered.

You have expressed some very general concerns regarding the issue of due process. I have discussed it with the Department's legal counsel, Rick Birdsall, and he has found your allegation too broad to respond to. If you have some specific due process concerns, we would be more than happy to address them.

Our specific response to your comments on the draft Consent Order are attached.

If you have specific additional concerns or questions, please contact me or Jean Liu at this office.

Sincerely,

Jim Smith, Program Supervisor Assessment and Mitigation Unit Southern California Section Toxic Substances Control Division

#### JS:JL:ccs

cc: Steve Tekosky City Attorney 1600 City Hall East 200 N. Main Street Los Angeles, CA 90012

> Iarrie Lance Toxic Epidemiology Program Hall of Administration 500 W. Temple Street, Room 180 Los Angeles, CA 90012

Tom Klinger
Los Angeles County
Department of Health Services
2615 S. Grand Ave, 6th Floor #607
Los Angeles, CA 90007

Richard Birdsall Office of Legal Services 1025 J. Street, 5th Floor Sacramento, CA 95814

# GENERAL 8 ELECTRIC

# UTILITY & INDUSTRIAL SALES & SERVICE DIVISION GENERAL ELECTRIC COMPANY • ONE RIVER ROAD • SCHENECTADY, NEW YORK 12345

Building 6 - 202

(518) 385-3720

June 15, 1987

#### **EMERY**

Mr. James Smith California Department of Health Services 107 South Broadway, Room 7011 Los Angeles, California 90012

Dear Mr. Smith:

Enclosed are my comments on the proposed Consent Order relating to the former GE site at 6900 Stanford Avenue, Los Angeles, California.

The list of objections is a long one. I would point out, however, that for the most part, the substantive provisions involving the actual clean-up have passed without objection while the procedural provisions have called forth some vehement reactions.

I understand that the purpose of the Order is to accomplish clean-up. The "stick" is that an enforcement order would be issued, but the "carrot" expressed in our meeting was that the order would protect GE from arbitrary and capricious action by DHS. In fact, however, the order specifically authorizes DHS action which is arbitrary, capricious and beyond the reach of any law. It appears that the "deal" is that if GE will give up the right to be treated in accordance with due process, DNR will give GE clear direction if DNR chooses to do so.

I am not certain what pressures exist to cause the Department to seek this kind of order. However, they may be strong, and negotiating an order satisfactory to both parties may turn out to be a long and difficult task.

Since the overall impression I received at the meeting in Los Angeles was a desire to proceed with the task, I have a modest proposal to make. If you agree, we will undertake the preparation of a work plan such as described in Article III and submit it to you within 90 days of your agreement to proceed in this informal way. If you approve the work plan, we will proceed to do the work and submit a report, and so on. When a Consent Order is agreed to, we can proceed from whatever point we have reached.

Your agreement to proceed in this way would not be in lieu of continuing negotiation on a consent order, the issuing of a compliance order or

# GENERAL 🍪 ELECTRIC

Mr. James Smith

Page 2

June 15, 1987

any other remedy you may be entitled to or right you may have. It is only a way to get on with the business at hand, while the lawyers sort out the procedural niceties.

Please contact me with your thoughts on either or both of my concerns with the consent order or my modest proposal.

Very truly yours,

William P. Thornton, Jr.

Counsel

Apparatus Service Department

WPT:cma

Richard Birdsall cc:

Stephen Tekosky

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#### Comments on Draft Consent Order

These comments are numbered based on the numbering system used in the draft.

- Heading: Delete "Endura Metal Products". That company has no connection with the property or its clean-up at this point in time.
- 1.4, Line 5: reference to "groundwater" should be deleted. There is no reason to believe that groundwater is affected in any way.
- 1.5, at the end of the first sentence, add the following:

  "or as an admission that any of the findings of fact are
  true, relevant, probative or admissible in any proceeding".
- 2.3, Delete and renumber following paragraphs. This statement is totally irrelevant with respect to anything that follows and it tends to be inflammatory.
- 2.4, first sentence should be changed to read as follows:

  "In March of 1983, the Los Angeles County Health Department received information that an anonymous informant claimed that large quantities of PCB transformer liquids were disposed of at the rear of the subject facility from 1946 to 1971 by GE."
- 2.5, delete and renumber following paragraphs. See comment to 2.3.
- 3.1, Thirty days is a short time span to produce the kind of work plan described. We would suggest 90 days.

To the extent that the standards referred to include ground-water studies, we object on the basis stated in 1.4 above. Also, to the extent that some work has already been done, e.g., air testing, we would propose not to include it in the plan, but to incorporate that work by reference.

- 3.2:(a) See comments re air (3.1) and groundwater (1.4).
- 3.3.1 See comments re air (3.1) and groundwater (1.4).
- Delete Item d. Hydrogeological Investigation. (See 1.4).
  RE: Item f. see comments in 3.1.
- 3.6 See comments under 6.8 below.

4.1 Thirty days is a short time span for the work involved especially since the start date is some date selected by DHA at its convenience. Persons required to work on the action plan may make time commitments without knowing when DHS will approve a plan. We would suggest 90 days.

To the extent that referenced standards and requirements include air and groundwater testing see 1.4 and 3.1.

4.2 RE: Plan approval, see 6.8 below.

RE: Air and groundwater, see 1.4 and 3.1.

Sixty days is too short, we suggest 120 days.

RE: Completion by July, 1989. It is entirely unknown whether this is feasible for two reasons:

- 1) It is unknown what the investigation will find and what the remedial action might be.
- 2) We cannot control the time spans (not specified in the order) used up by DHS in the approval cycles. Furthermore, since schedules are part of all plans and all are subject to DHS, this provision is overkill.
- 4.2.1 See comments under 6.8 below.
- 4.2.3 See comments under 6.8 below.
- 4.2.4 To the extent that this paragraph suggests that DHS can order us to higher levels of clean-up than those approved in the RAP, see comments under 6.8 below.
- 4.3 RE: References to air and groundwater see 1.4 and 3.1.

We are not willing to provide a letter of credit in any amount. We do not believe that a letter of credit or performance bond is required from a corporation with the assets of General Electric Company. In other areas of environmental concerns, e.g., security for closing costs, GE's assets are accepted as adequate security.

4.3.1 Delete references to Letter of Credit.

#### 5.1 and 5.2

These paragraphs represent a blank check and we cannot agree to them without some quantification. You should be able to tell us now about direct cost incurred so far. You should be able to tell us about billing rates for staff time. There should be guidelines concerning appropriate activities covered by these paragraphs.

- DHS should compute the 10% adder. Administratively, we should get bills in the amount we need to pay. Otherwise, there will be occasions where the adder is overlooked, and our auditors may require a copy of the consent order attached to each invoice to justify the payment.
- This paragraph should be limited to providing a person responsible for the community relations plan. As written, the paragraph requires a "communications specialist". I do not know what a "communications specialist" is. If we could find one, we are not certain we could find one who has "experience in hazardous waste site clean-up".
- 6.5 RE: References to approvals by DHA see 6.8
- Subparagraph a. permits DHS to "approve" a plan of its own design regardless of anything GE might do. The concept of an "approved plan" or DHS "approval" of various steps or elements of the clean-up effort is woven throughout the Consent Order. GE is required to perform in accordance with such "approvals".

  Moreover, there appears to be no way for GE to obtain review of any action or "approval" by DHA. GE has no way of assuring that DHS acts in accordance with governing law. Essentially, this amounts to a waiver of GE's due process rights.

If the Consent Order were a court order, GE would retain the right to petition the court for an amendment of the order in the event of a situation felt to exceed the law or violate due process. Under this provision, GE has no rights and no redress. This problem is fundamental and needs to be addressed. This Consent Order was presented as a way to assure GE that DHS would not act in any arbitrary way, but this paragraph makes it absolutely clear that DHS reserves every right to be arbitrary, capricious and act in excess of its legal powers.

- 6.9 This paragraph further underscores the problems discussed in 6.8.
- The effective date of the agreement starts certain periods running. Under this provision, DHS may sign the Order and put it in a desk drawer. The effective date should be only after GE signs it (or else it is an Order rather than a Consent Order) and only after a copy signed by DHS is given to GE.
- 6.11 This paragraph involves more issues such as 6.8.

- 6.14 What are the rules for identifying DHS staff and "authorized representatives"? There should be provisions for compliance by staff and representatives with the safety plan provided by GE.
- 6.15 Second sentence: Taking duplicate samples by DHS staff or representatives is a wasteful activity. GE should at DHS's request and perhaps under DHS supervision take split or duplicate samples to avoid redundant sampling costs.
- 6.16 See 6.8
- 6.17 See 6.8
- 6.18 See 6.8
- 6.19 DHS here and elsewhere maintains off contract judicial remedies not permitted to GE. See 6.8.
- 6.22 See 6.19 re second sentence.
- 6.23 and 6.24:

Although 6.23 says that only GE is bound, 6.24 suggests that DHS may also be bound. Although I have carefully reviewed the agreement several times, I have not found a single obligation in the present draft binding on DHS.

## DEPARTMENT OF HEALTH SERVICES

107 SOUTH BROADWAY LOS ANGELES, CALIFORNIA 90012



July 21, 1987

William P. Thornton Jr., Counsel Apparatus Service Department General Electric Company One River Road Schenectady, N.Y. 12345

Dear Mr. Thornton:

RESPONSE TO YOUR COMMENTS ON THE DRAFT CONSENT ORDER (1811-17)

JUL 2 / 1987

Attached please find the specific response to your comments on the draft Consent Order. This was to be attached with the letter of July 9, 1987 from the Department.

If you have any questions regarding the subject matter, please contact me or Jean Liu of this office.

Sincerely

Jim Smith, Program Supervisor
Assessment & Mitigation Unit
Toxic Substances Control Division

JS:JL:jl

c: Steve Tekosky
City Attorney
1600 City Hall East
200 N. Main Street
Los Angeles, CA 90012

Larrie Lance Toxic Epidemiology Program Hall of Administration 500 W. Temple Street, Room 180 Los Angeles, CA 90012

Tom Klinger
Los Angeles County
Department of Health Services
2615 S. Grand Ave., 6th Floor, #607
Los Angeles, CA 90007

Richard Birdsall Office of Legal Services 1029 J. Street, 5th Floor Sacramento, CA 95814

## Response to June 15, 1987

#### Comments

Heading:	Agree	With	Comment.
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- 1.4, line 5: Potential or actual impact of the site on ground water cannot be determined without specific analysis.
- 1.5: Agree.
- 2.3: Disagree. The investigation should not presuppose that Endura did not contribute to the release of hazardous substances. It is true that no such evidence has thus far been developed.
- 2.4: Agree.
- 2.5: Disagree. This is relevant to site history, although the specific significance of the data is limited.
- 3.1: Agree to 60 days.

Agree to incorporate existing data that meets appropriate quality control standards, not "by reference", however.

Disagree with regard to ground water, although it is possible that assessment of ground water issues <u>could</u> stop <u>short</u> of actual ground water monitoring.

- 3.4: Disagree with deletion would consider alternative, substantive analysis.
- 4.1: DHS' experience is that the Remedial Action Plan is primarily a summarization of data gathered in the RI/FS stages and a selection of an alternative or alternatives for remediation. No new information is necessary. However, extensions would be readily granted for good cause.

## 4.2., sixty days:

DHS' experience is that 60 days is sufficient. Also see 4.1 above.

# 4.2., July 1989:

DHS believes strongly in a "bottom-line". DHS has no interest in unnecessary delays. If G.E. has alternative proposal which includes a reasonable final date, it should recommend it.

- 4.3: Agree.
- 5.1 and 5.2: DHS is revising its policy to provide for "up-front" funding.

DHS agrees to a more specific accounting of past and anticipated oversight costs to be paid, at least in part, in advance. G.E. would still be afforded full access to specific oversight costs, which would include details of staffing levels and activities.

- 5.3: The 10% administrative cost is statutorily mandated. See 5.2 above.
- 6.3: DHS' experience is that it is G.E.'s interest to provide qualified community relations support. DHS can provide a list of qualified consultants in this area.
- 6.8: DHS is statutorily responsible for enforcing State Superfund law. The law grants DHS the authority to approve such plans. G.E. has full due process rights as regards DHS cost recovery actions and G.E. may challenge actions of DHS which G.E. believes exceed its authority at the appropriate time.

If DHS acts in an arbitrary and capricious manner, it will not recover costs and G.E. suffers no damage.

- Disagree. In part to ensure potentially responsible parties that such abuse (we agree that your suggested scenario would be an abuse) will not occur, the Department will sign the Order last. The Order would not be effective until after G.E. signs it, returns it to the Department, and the Department signs it.
- 6.14: The Department and its representatives (who we will identify for G.E. by name and relationship at the appropriate time), will be required to comply with G.E.'s health and safety plan, as approved by the Department per its statutory authority and responsibility.
- Agree, except that it should not be implied that the Department's authority is exercised by "request". The Department will act in a responsible and professional manner and will make no unreasonable demands with regard to split or duplicate samples.
- 6.19: Counsel will comment.

6.23 and

The Order is issued to G.E., not the Department. However, the Department is otherwise bound not to act in an unreasonable, arbitrary and capricious manner. If G.E. has a substantive proposal to present on the subject, it should do so and the Department wil consider it.

#### STATE OF CALIFORNIA

DRAFT 4/29/87

#### HEALTH AND WELFARE AGENCY

#### DEPARTMENT OF HEALTH SERVICES

In the matter of:

Endura Metals
6900 Stanford Avenue
Los Angeles, CA 90001
A Former General
Electric Facility

CONSENT ORDER
Health and Safety Code Sections
205, 25355.5 (a)(1)(B),
25355.5 (a)(1)(C)

#### I. INTRODUCTION.

- 1.1. <u>Parties</u>. This Consent Order is issued by the State Department of Health Services ("DHS") to General Electric Company (GE), a corporation incorporated in New York and qualified to do business in California since October 13, 1892.
- 1.2 <u>Site</u>. This Consent Order addresses air, soil, surface water and ground water contamination at Endura Metals ("site") previously owned and operated by GE and located at 6900 Stanford Avenue, Los Angeles, California.
- 1.3. <u>Jurisdiction</u>. This Consent Order is issued by DHS to GE pursuant to its authority under California Health and Safety Code Sections 205, 25355.5 (a) (l) (B) and 25355.5 (a) (l) (C). GE acknowledges DHS' jurisdiction and waives any right it may have to a hearing or determination prior to the issuance of this Consent Order.

- 1.4. <u>Purpose</u>. In entering into this Consent Order it is the objective of the parties to ensure that any release or threatened release of a hazardous substance or hazardous waste (also referred to as "contaminants" or "contamination") to the air, soil, surface water and ground water at or from the site are thoroughly investigated and appropriate remedial actions are taken.
- 1.5. <u>Denial of Liability</u>. GE's consent to the issuance of this Consent Order shall not be construed as an admission of any liability for the conditions at the site. Nothing in this paragraph is intended or shall be construed to limit DHS' right to enforce this Consent Order through appropriate proceedings.

#### II. FINDINGS OF FACTS

- 2.1. The site which is the subject of this Consent Order is located at 6900 Stanford Avenue, Los Angeles, Los Angeles County, California 90001. A site map is attached as Exhibit A and incorporated herein by reference.
- 2.2. The site was occupied by General Electric Company from February of 1946 to December of 1971. For over 25 years, GE operated an apparatus repair service shop at the site. Polychlorinated biphenyl (PCB) filled transformers were processed and repaired on the site.
- 2.3. Endura Metals used the site to manufacture stainless steel kitchen and restaurant cabinets and tables from 1974 until February of 1986.

- 2.4. In March of 1983, the Los Angeles County Health Department was informed that large quantities of PCB transformer liquids were disposed of at the rear of the subject facility from 1946 to 1971 by GE. The County Health Department took soil and liquid samples from the site in March, 1983. Laboratory analysis of these samples revealed PCB levels ranging from 13 parts per million (ppm) to 1290 ppm. GE was directed by the County Health Department to clean up the site by May of 1983. Sampling results are attached as Exhibit B and incorporated herein by reference.
- 2.5. On April 18, 1983, sampling was conducted by the Los Angeles County Health Department. Laboratory analysis of these samples revealed a maximum of 1.5 micrograms (ug) per 100 square centimeter (cm<sup>2</sup>) of PCB contamination on surfaces of the cabinets to be installed in restaurant kitchens.
- 2.6. Some decontamination of the PCB contaminated areas was conducted both on and off the site in 1983 and 1984.
- 2.7. County Health Department's letter of November 21, 1984 indicated that verification sampling done after decontamination activities still showed PCB levels as high as 3300 ppm on the floor in the center of the two buildings on-site. GE was directed to further decontaminate the areas where high levels of PCB were found.
- 2.8. Further soil sampling was conducted by Bechtel National, Inc. (Bechtel), a contractor for GE, in February of 1985. Sample analysis was conducted by Brown and Caldwell Analytical Laboratories (B&C). Fourteen (14) of fifty-two (52) samples tested revealed PCB contamination levels in soil greater

than 50 ppm. The highest level was 5200 ppm. Laboratory results and sampling locations are shown and attached as Exhibit C and incorporated herein by reference.

- Between July of 1984 and March of 1985, sampling was conducted by Med-Tox Associates Corporation (Med-Tox) for Endura Sampling results revealed PCB contamination in surface wipe samples as high as 4100 ug per wipe, in bulk samples as high as 15000 ppm, in core samples as high as 4080 ppm. Polychlorinated dibenzodioxins (PCDDs) and polychlorinated dibenzo furans (PCDFs) analyses were performed by Brehm Laboratory. Sampling results showed 2,3,7,8-tetra chlorinated dibenzodioxin billion (dgg) and 0.498 parts per (TCDD) was 2,3,7,8-tetrachlorinated dibenzofuran (TCDF) was 24.3 ppb. PCDD was 281.0 ppb, and total PCDF was 442.5 ppb. Laboratory results are attached as Exhibit D and incorporated herein by reference.
- On May 15, 1985, seventeen (17) soil/dust samples were collected from the site for the purpose of PCB, dioxin and furan The samples were collected, divided three ways and distributed to Med-Tox, Bechtel, and the State Department of Brehm Laboratory analyzed the samples for Health Services. showed elevated levels of results Analytical Med-Tox. 2,3,7,8-TCDF as high as 27.4 ppb in the sample collected from the ceiling of the east building. The highest concentration of 2,3,7,8-TCDF found by Lars-Owe Kjeller of Sweden for Bechtel was Laboratory results are attached as Exhibit E and incorporated herein by reference.

The polychlorinated biphenyls (PCBs) represent a group of compounds with a variable number of chlorine atoms attached to a biphenyl core. They are fat soluble and are readily absorbed and transferred across biological membranes, where they accumulate and persist in fat tissues. They are only slowly metabolized from The metabolites are excreted in urine. Although many animal studies of PCB toxicity have been performed, the evidence of adverse health effects in humans is suggestive in nature. human beings, chronic toxicity is probably more important than acute toxicity. Ingestion and direct contact with PCBs have been associated with a number of dermatologic conditions, including burning sensations, hyperpigmentation, thickening fingernails, and chloracne, a severe and painful persistent acne, which may cause open, running sores. Other acute effects which may be related to PCB exposure include unusual eye discharges, swelling of eyelids, and liver dysfunction. effects observed in human beings include chloracne, elevated blood pressure, autonomic nervous system disturbances, liver dysfunction, reproductive pathology (including spontaneous abortion, incomplete spontaneous abortion, and small size for gestational age), and cancer (malignant melanoma and ocular (eye) melanoma). It is important to note that some of these effects may be due to other contaminants contained in PCB mixtures, including chlorinated dioxins and dibenzofurans, or to the joint effects of exposure to the combination of substances in these mixtures. PCBs are a listed hazardous material (#606) in Section 6680 of Title 22 of the California Administrative Code and are hazardous substances

within the meaning of Health and Safety Code Section 25316. The United States Environmental Protection Agency reviewed the health effects of PCBs in a drinking water criteria document in 1985. Chapter VI of that document summarizes the health effects. It is attached as Exhibit F and incorporated herein by reference. PCBs are on the Governor's list of cancer causing agents, pursuant to the Safe Drinking Water and Toxic Enforcement Act of 1986.

2.12. Polychlorinated dibenzodioxins (PCDDs or dioxins) and polychlorinated dibenzofurans (PCDFs or furans) are tricyclic, almost planar aromatic compounds that exhibit very similar physical, chemical and biological properties. The most toxic PCDD and PCDF isomers are listed in the table below:

Dioxins	Furans
2,3,7,8-tetra-CDD 1,2,3,7,8-penta-CDD 1,2,3,6,7,8-hexa-CDD 1,2,3,7,8,9-hexa-CDD 1,2,3,4,7,8-hexa-CDD	2,3,7,8-tetra-CDF 1,2,3,7,8-penta-CDF 2,3,4,7,8-penta-CDF 1,2,3,6,7,8-hexa-CDF 1,2,3,7,8,9-hexa-CDF 1,2,3,4,7,8-hexa-CDF 2,3,4,6,7,8-hexa-CDF

Animal studies demonstrate that 2,3,7,8-TCDD (the tetra form) is among the most acutely toxic human-made chemical. The tetra-forms of PCDD and PCDF are chemically closely related and probably have comparable toxicity. In animals, PCDDs and PCDFs have been demonstrated to produce a variety of reproductive, dermal, hepatic, immunologic, and carcinogenic effects and death at very low exposure levels in the parts per trillion range. Because

almost all exposures to dioxins and furans are in circumstances of mixed exposure to a variety of chemicals, there is not a clear picture of the precise nature of the effects of the pure compounds in human beings. There is, however, very suggestive evidence of human birth defects and soft tissue sarcomas in mixed exposures that do not appear to be explained by other substances in the mixtures. Because dioxins have a powerful effect on the induction of enzymes, they have the potential to affect a variety of organ systems through synergism or antagonism with natural biologic processes or with exposures to other chemicals. The Department of Health Services' informal "action level" for PCDDs and PCDFs combined is 1 ppb. The United States Environmental Protection Agency reviewed health effects of polychlorinated dibenzo-p-dioxins in a health assessment document in Chapter 14 of that document presents a summary of health effects. It is attached as Exhibit G and is incorporated herein by reference.

### III. REMEDIAL INVESTIGATION AND FEASIBILITY STUDY

3.1. Workplan Submission. Within 30 calendar days of the effective date of this Consent Order, GE shall submit to DHS for review and approval a detailed workplan and implementation schedule which covers all the activities necessary to conduct a complete remedial investigation and feasibility study of the site and any areas where there is a release or threatened release of hazardous substances from the site. The workplan and activities

under it shall, at a minimum, conform to the National Contingency Plan (40 CFR Part 300), as amended, and the U.S. Environmental Protection Agency's "Guidance on Remedial Investigation under CERCLA" and "Guidance on Feasibility Studies under CERCLA", both dated June 1985, as amended, the Department's "Site Mitigation Decision Tree", as well as state laws and regulations.

- 3.2. Workplan Objectives. The objectives of the workplan are to:
  - (a) Determine the nature and full extent of contamination of air, soil, surface water and ground water at the site and adjacent areas;
  - (b) Identify all existing and potential migration pathways, including the direction, rate and dispersion of contaminant migration;
  - (c) Identify and evaluate appropriate remedial measures to prevent future releases and mitigate any releases which have already occurred;
  - (d) Collect and evaluate the information necessary to prepare a remedial action plan in accordance with the requirements of Health and Safety Code Section 25356.1.
- 3.3. Workplan Contents. The workplan shall cover each of the following elements: remedial investigation, remedial investigation report, feasibility study and feasibility study report and shall contain a schedule for implementation of each element.
- 3.3.1. The remedial investigation portion of the workplan shall include at least the following elements:

- a. A history of the site including a list of the hazardous materials used on-site and their estimated volumes and concentrations, a description of all manufacturing processes which are or were related to each hazardous material or produced any hazardous waste, and a site map delineating each area where hazardous materials and/or hazardous wastes were disposed of, treated, stored, transferred, transported, handled or used;
- b. A summary of all air, soil, surface water and ground water assessment work completed to date, including data reduction and interpretation of the data;
- c. A description of the activities which will be undertaken to develop a complete profile of on-site and off-site air, soil, surface water and ground water contamination attributable to operations at the site;
- d. Sampling protocols for air, surface water, standing liquid, ground water, sediment, surface soil and subsurface soil;
- e. Analytic and quality control protocols for all sampling and analysis programs including:
  - (1) adequate sample identification;
  - (2) sample preservation techniques;
  - (3) chain of custody procedures;
  - (4) use of DHS approved analytical methods;
  - (5) identification of qualified person(s)
    conducting the sampling; and

- (6) identification of a certified laboratory which will perform the analyses.
- f. A description of locations where sampling will occur, and a list of chemical analyses to be performed;
- g. Engineering specifications for all installations such as ground water monitoring wells, and piezometers.
- h. A description of provisions for gaining access to and obtaining samples from adjacent properties, where appropriate;
- i. A description of how the data obtained pursuant to this Consent Order will be managed and preserved by GE in accordance with paragraph 6.15;
- j. A site health and safety plan which covers all measures including contingency plans which will be taken to protect persons on and off the site from exposure to hazardous wastes, substances or materials during activities under the workplan. A detailed guidance is attached as Exhibit H and incorporated herein by reference; and
- k. A community relations plan (CRP) for informing local residents and other agencies about activities at the site and responding to inquiries from concerned citizens. An outline is attached as Exhibit I and incorporated herein by reference.
- 3.3.2. The remedial investigation report portion of the workplan shall describe the steps necessary to submit this report in compliance with paragraph 3.4.

- 3.3.3. The feasibility study portion of the workplan shall include at least the following elements:
  - a. A summary of the existing and potential hazards for which corrective action is required;
  - b. A description of the alternative remedial actions which will be evaluated;
  - c. A list of the technologies which will be screened for each alternative remedial action described in (b) above;
  - d. A description of the factors which will be considered in screening and analyzing each alternative remedial action technology, including, but not limited to, effectiveness, reliability, timeliness of implementation, unit cost, availability, operation and maintenance costs and conformity with applicable laws and regulations;
  - e. A list of the criteria for screening and analyzing the alternative remedial action technologies; and
  - f. A description of all pilot studies, bench tests or other activities which will be performed to evaluate each alternative remedial action technology.
- 3.3.4. The feasibility study report portion of the workplan shall describe the steps necessary to submit this report in compliance with paragraph 3.5.
- 3.4. Remedial Investigation Report. The remedial investigation report shall be submitted by GE to DHS for review and approval in accordance with the approved workplan schedule. The remedial investigation report shall summarize the results of the remedial investigation including reduction and interpretation

of all data and information generated and/or compiled during the remedial investigation. The remedial investigation report shall cover the following subjects relating to the site:

- a. Introduction
  - 1. Overview of Report
  - 2. Site Background Information
  - Nature and Extent of Problem(s)
  - 4. Remedial Investigation Summary
- b. Site Features Investigation
  - 1. Demography
  - 2. Land Use

#### 3. Natural Resources

- 4. Climatology
- c. Hazardous Substance Investigation
  - 1. Waste Types
  - 2. Waste Component Characteristics and Behavior
- Hydrogeologic Investigation
  - 1. Soils
  - 2. Geology
  - 3. Ground Water
- e. Surface Water Investigation
  - 1. Surface Water
  - 2. Sediments
  - 3. Flood Potential
  - 4. Drainage
- f. Air Investigation

- g. Biota Investigation
  - 1. Flora
  - 2. Fauna
- h. Bench and Pilot Tests
- i. Public Health and Environmental Concerns
  - 1. Potential Receptors
  - 2. Public Health Impacts
  - 3. Environmental Impacts

### J. Community Relations Plan .

- 3.5. Feasibility Study Report. The feasibility study report shall be submitted to DHS for review and approval in accordance with the approved workplan schedule. The feasibility study report shall summarize the results of the feasibility study including reduction and interpretation of all data and information generated and/or compiled during the feasibility study. The feasibility study shall cover the following subjects relating to the site.
  - a. Description of Current Situation
    - 1. Site Background Information
    - 2. Nature and Extent of Release
    - 3. Objective of Remedial Action(s)
  - b. Screening of Remedial Action Technologies
    - 1. Technical Criteria
    - 2. Remedial Action Alternatives Developed
    - 3. Environmental and Public Health Criteria
    - 4. Other Screening Criteria

- 5. Cost Criteria
- c. Analysis of Remedial Action Alternatives
  - 1. Technical Feasibility
  - 2. Environmental Evaluation
  - 3. Institutional Requirements
  - 4. Public Health Evaluation
  - 5. Cost Analysis
- d. Recommended Remedial Action
- 3.6. <u>Workplan Implementation</u>. GE shall implement the workplan as approved by DHS in accordance with the approved schedule.

#### IV. REMEDIAL ACTION PLAN

- 4.1. Draft Remedial Action Plan. Within 30 calendar days of DHS approval of the feasibility study report GE shall prepare and submit to DHS for review and approval a draft remedial action plan (RAP). The RAP shall set forth in detail appropriate steps to remedy air, soil, surface water and ground water contamination at the site and adjacent areas. The RAP shall be prepared in accordance with the standards and requirements set forth in California Health and Safety Code Section 25356.1. In addition, the RAP shall contain a schedule for implementation of all removal and remedial actions proposed to be taken.
- 4.2. Implementation of Final Remedial Action Plan. Within 60 days after DHS approval of the final RAP, in accordance with California Health and Safety Code Section 25356.1, GE shall submit

DHS a detailed RAP workplan containing technical operational plans and engineering designs for implementation of the approved remedial or removal action alternative(s), and a schedule for implementing the construction phase. The workplan shall also describe the nature and design of the construction or equipment to be employed, a site specific hazardous waste transportation plan (if necessary), the identity of contractors, transporters and other persons conducting the removal remedial activities for GE, post remedial sampling and monitoring procedures for air, soil, surface water and ground water and shall cover all of the subjects described in paragraph 3.3.1 subdivisions (d), (e), (f), (h), (g), (i), (j) and (k) as they pertain to the removal and remedial activities. The schedule submitted with the workplan shall provide that all approved removal or remedial actions excluding operation and maintenance shall be completed by July, 1989.

- 4.2.1. Upon DHS approval of the RAP workplan and schedule, GE shall implement the final RAP as approved in accordance with the approved RAP workplan and schedule.
- 4.2.2. GE shall be responsible for all operation and maintenance requirements in accordance with the final RAP and RAP workplan.
- 4.2.3. During the implementation of the final RAP and RAP workplan DHS may specify such additions, modifications and revisions to the RAP workplan as it deems appropriate to implement the RAP.

- 4.2.4. Any remedial technology employed in implementation of the final RAP shall be left in place and operated by GE until and except to the extent that DHS determines and states in writing that GE may discontinue or modify some or all of such remedial technology because GE has met the criteria specified in the final RAP for discontinuance of such technology or because such modifications would better achieve the goals of the final RAP.
- 4.3. Letter of Credit. GE agrees to pay all costs required to characterize and remedy all air, soil, surface water and groundwater contamination at the site and adjacent areas as set forth in the approved remedial investigation/feasibility study Workplan, the final RAP and the RAP workplan. To insure such performance GE shall obtain a letter of credit in favor of DHS within 20 calendar days of the effective date of this Consent Order. The performance bond shall be in the amount of \$500,000.
- 4.3.1. GE expressly recognizes that the actual costs of performing the remedial investigation/feasibility study workplan, the final RAP, the RAP workplan and the other activities described herein, may exceed the amount of the letter of credit described in paragraph 4.3 and expressly agrees that its obligations under this Consent Order are not limited in any way by the amount of that credit. Nothing in this paragraph or in paragraph 4.3 is intended to limit any rights GE may have to recover any of its costs from other entities.

#### V. PAYMENTS TO DHS

- 5.1. DHS Direct Costs. GE shall reimburse DHS for all direct costs, including staff time, for review of activities by GE under this Consent Order and for any direct costs incurred by DHS prior to the issuance of this Consent Order and as a result of the release or threatened release of hazardous substances or hazardous wastes at the site. GE shall reimburse DHS for such costs within 30 calendar days from receipt of an invoice from DHS.
- 5.2. <u>DHS Contractor Costs.</u> GE shall also reimburse DHS for all DHS' costs for contractor review of activities by GE under this Consent Order. GE shall reimburse DHS for such costs within 30 calendar days from receipt of an invoice from DHS.
- 5.3. DHS Administrative Costs. GE shall pay to DHS an additional amount, equal to ten percent (10%) of the costs described in paragraphs 5.1 and 5.2 as reimbursement for DHS' general administrative costs. This amount shall be calculated by GE and paid at the times specified in paragraphs 5.1 and 5.2 for payment of direct and contractor costs, without the necessity of a separate invoice from DHS.

#### VI. OTHER PROVISIONS

6.1. <u>Project Coordinator</u>. Within five (5) calendar days of the effective date of this Consent Order, GE shall submit to DHS in writing the name and address of a project coordinator whose

responsibilities will be to receive all notices, comments, approvals and other communications from DHS to GE.

- 6.2. Project Engineer/Geologist. The work performed pursuant to this Consent Order shall be under the direction and supervision of a qualified professional engineer or a certified geologist with expertise in hazardous waste site cleanup. The name and address of the project engineer or geologist chosen by GE shall be submitted to DHS within eight (8) calendar days of the effective date of this Consent Order.
- 6.3. Communication Specialist. The community relations plan in the workplan developed pursuant to this Consent Order shall be under the direction and supervision of a qualified communication specialist with experience in hazardous waste site cleanup. The name and address of the communication specialist chosen by GE shall be submitted to DHS within eight (8) calendar days of the effective date of this Consent Order.
- 6.4. Monthly Summary Reports. Within thirty (30) calendar days of the effective date of this Consent Order and monthly thereafter, GE shall submit a monthly summary report of its activities under the provisions of this Consent Order. The report shall describe: 1) specific actions taken by or on behalf of GE during the previous calendar month, 2) actions expected to be undertaken during the current calendar month, and 3) all results of sample analyses, tests and other data generated or received by GE, and 4) expenditures to date by GE under this Consent Order. The monthly summary report shall be received by DHS by the 15th day of each month.

- 6.5. <u>Incorporation of Documents</u>. All plans, schedules, reports, specifications, and other documents required or submitted by GE pursuant to this Consent Order are, upon written approval by DHS, incorporated in this Consent Order and shall be implemented by GE as approved. Any noncompliance with such documents shall be a noncompliance with this Consent Order.
- 6.6. <u>Exhibits</u>. All Exhibits attached hereto are incorporated herein by this reference.
- 6.7. <u>Submittals and Approvals</u>. All submittals and notifications from GE required by this Consent Order shall be sent simultaneously to:

Mr. Angelo Bellomo, Chief Southern California Section Toxic Substances Control Division 107 S. Broadway, Room 7011 Los Angeles, CA 90012

Dr. Robert P. Ghirelli
Executive Officer
California Regional Water Quality
Control Board
Los Angeles Region
107 S. Broadway Room 4027
Los Angeles, CA 90012

Mr. Al Hearne County of Los Angeles Department of Health Services 313 N. Figueroa Street Los Angeles, CA 90012

All approvals and decisions of DHS made regarding such submittals and notifications shall be communicated to GE in writing by the Section Chief or his designee. No informal advice, guidance, suggestions or comments by DHS regarding reports, plans, specifications, schedules or any other writing prepared or

submitted by or for GE shall be construed to relieve GE of its obligation to obtain such formal approvals as may be required herein.

- 6.8. <u>DHS Review and Approval</u>. If after review of any report, plan, schedule, remedial action plan or other document which GE submits for DHS approval pursuant to this Consent Order, DHS determines that the document is not satisfactory and cannot be approved, DHS may take the following actions:
  - a. Make modifications to the submitted document as deemed necessary by DHS to protect public health and safety or the environment, and approve the document as modified; and/or
  - b. Return the submitted document to GE with recommended changes. Within a time period specified by DHS, GE shall submit a revised document incorporating the recommended changes to DHS for approval. All such approvals by DHS shall be in writing.
- 6.9. Modifications. GE may by written request seek modification, termination or revision of this Consent Order or any portion of this Consent Order or any program or plan submitted pursuant to this Consent Order at any time. This Consent Order and any applicable program, plan, or schedule may be modified, terminated or revised by mutual written agreement of the parties at any time. In addition, DHS reserves the right to take additional enforcement action including issuing new or additional Orders as provided by law. Any modification to this Consent Order

shall be effective upon issuance and deemed incorporated in this Consent Order.

- 6.10. <u>Time Periods</u>. Unless otherwise specified, time periods begin from the effective date of this Consent Order and "days" means calendar days. The effective date of this Consent Order is the date of signature by DHS.
- 6.11. Extension Requests. If, for any reason, GE is unable to perform any activity or submit any document within the time required under this Consent Order, GE may request, in writing an extension of the time specified. The extension request shall include a justification for the delay. All such requests shall be in advance of the date on which the activity or document is due.
- 6.12. Extension Approvals. If DHS is convinced that good cause exists for an extension as set forth in paragraph 6.11, it will grant the request and specify in writing a new schedule. GE shall comply with the new schedule.
- 6.13. Endangerment During Implementation. In the event that the Section Chief of the Southern California Section of the Toxic Substances Control Division of the Department (or his equivalent in any successor agency) determines that any activities or circumstances are creating an imminent or substantial endangerment to the health and welfare of people on the site or in the surrounding area or to the environment, the Section Chief (or equivalent) may order GE to stop further implementation of this Consent Order for such period of time as needed to abate the endangerment. Any deadline contained in this Consent Order which

is directly affected by a Stop Work Order under this section shall be extended for the term of such Stop Work Order.

- 6:14. Site Access. DHS and/or its authorized representatives shall have the authority to enter and move freely about all property at the site at all reasonable times for the purposes of, inter alia: inspecting records, operations logs, sampling and analytic data, and contracts related to this Consent Order; reviewing the progress of GE in carrying out the terms of this Consent Order; conducting such tests as DHS may deem necessary; and verifying the data submitted to DHS by GE. Nothing in this paragraph is intended or shall be construed to limit in any way the right of entry or inspection that DHS or any other agency may otherwise have under law.
- 6.15. Sampling, Data and Document Availability. GE shall permit DHS and/or its authorized representatives to inspect and copy all sampling, testing, monitoring or other data generated by GE or on GE's behalf in any way pertaining to work undertaken pursuant to this Consent Order. GE shall allow duplicate samples to be taken by DHS and/or its authorized representatives, of any samples collected by GE pursuant to this Consent Order. GE shall maintain a central depository of the data, reports, and other documents prepared pursuant to this Consent Order. reports and other documents shall be preserved by GE for a minimum of six years after the conclusion of all activities under this If DHS requests that some or all of these Consent Order. documents be preserved for a longer period of time, GE shall either comply with that request or deliver the documents to DHS or

permit DHS to copy the documents prior to destruction. GE shall notify DHS in writing at least six months prior to destroying any documents prepared pursuant to this Consent Order.

- 6.16. Noncompliance. In the event DHS believes that GE is not in compliance with this Consent Order, or with any reports, plans, specifications, schedules or other documents incorporated as part of this Consent Order pursuant to paragraph 6.5., DHS may provide GE notice in writing of such noncompliance. If GE does not remedy such noncompliance to the satisfaction of DHS within the time period specified by DHS in the notice, DHS may immediately proceed to spend state funds for removal or remedial action at the site. DHS may also seek penalties for noncompliance as provided in paragraph 6.17. and cost recovery for state funds expended as provided in paragraph 6.18. If GE remedies such noncompliance to the satisfaction of DHS and within the time period specified by DHS, GE shall not be deemed to be in noncompliance with this Consent Order.
- 6.17. Penalties for Noncompliance. Failure to comply with the provisions of this Consent Order, or with any reports, plans, specifications, schedules or other documents incorporated as part of this Consent Order pursuant to paragraph 6.5., may subject GE to civil penalties and/or punitive damages as provided by the California Health and Safety Code and other applicable provisions of law, in addition to cost recovery as specified in paragraph 6.18.
- 6.18. <u>Cost Recovery</u>. Failure or refusal of GE to comply with this Consent Order may make GE liable for any government

costs incurred, including those payable from the Hazardous Substance Account or the Hazardous Substance Cleanup Fund for any remedial action at the site, as provided in Section 25360 of the Health and Safety Code and other applicable provisions of law. These costs include DHS' direct costs and DHS' administrative overhead costs in an amount equal to 10 percent of the reasonable cost actually incurred, or five hundred dollars (\$500), whichever is greater.

- 6.19. Additional Enforcement Actions. By issuance of this Consent Order, DHS does not waive any further enforcement actions.
- 6.20. <u>Compliance with Applicable Laws</u>. GE shall carry out this Consent Order in compliance with all applicable local, State, and Federal requirements, including, but not limited to, requirements to obtain permits and to assure worker safety.
- 6.21. Government Liabilities. The State of California shall not be liable for any injuries or damages to persons or property resulting from acts or omissions by GE, its officers, directors, employees, agents, receivers, trustees, successors, or of any persons, including but not limited to, firms, corporations, subsidiaries, contractors, or consultants in carrying out activities pursuant to this Consent Order, nor shall the State of California be held as party to any contract entered into by GE or its agents in carrying out activities pursuant to this Consent Order.
- 6.22. Reservation of Rights. Nothing in this Consent Order is intended or shall be construed to limit the rights of any of the parties hereto with respect to claims arising out of or

relating to the deposit or disposal at any other location of substances removed from the facility. Nothing in this Consent Order is intended or shall be construed to limit or preclude DHS from taking any other action authorized by law to protect the public health and welfare or the environment and recovering the costs thereof.

- 6.23. Severability. The requirements of this Consent Order are severable, and GE shall comply with each and every provision hereof notwithstanding the effectiveness of any other provision.
- 6.24. Parties Bound. This Consent Order applies to and is binding upon GE, its directors, officers, agents, employees, contractors, and their successors and assigns and upon DHS and any successor agency with responsibility for administering the provisions of Chapter 6.8 of Division 20 of the Health and Safety Code.
- 6.25. Representative Authority. Each undersigned representative of the parties to this Consent Order certifies that he or she is fully authorized to enter into the terms and conditions of this Consent Order and to execute and to legally bind such party to this document.

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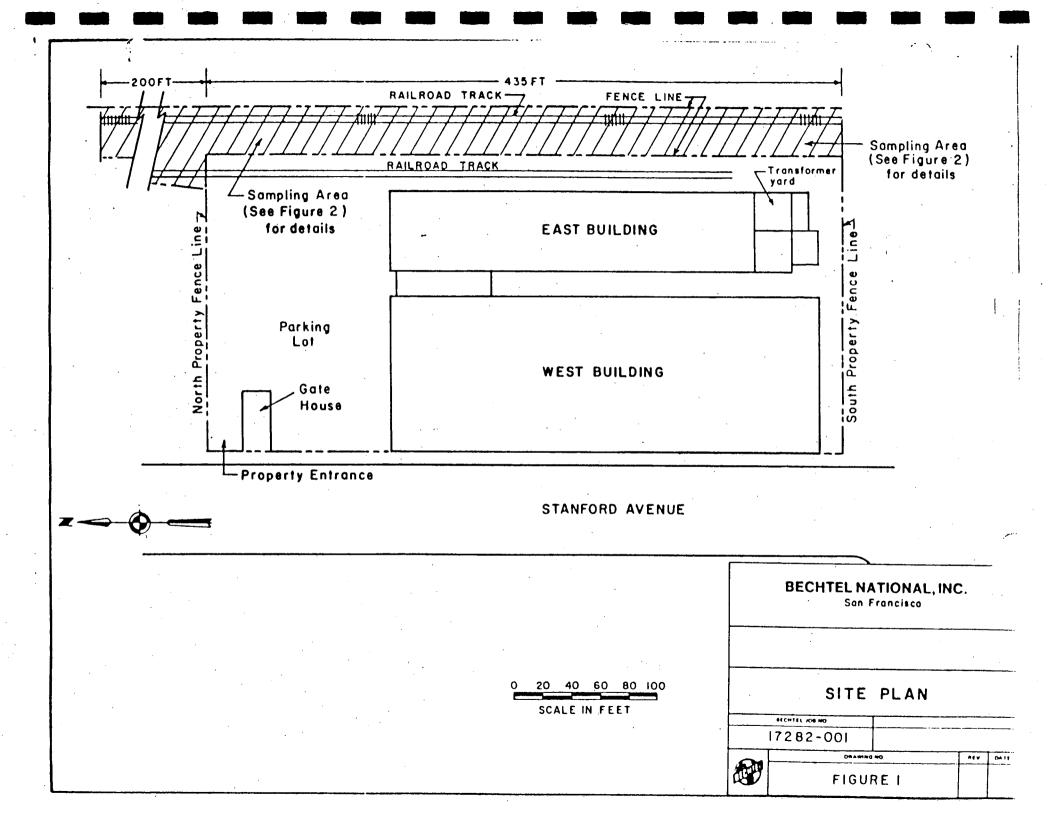


EXHIBIT B



### COUNTY OF LOS ANGELES • DEPARTMENT OF HEALTH SERVICES



313 NORTH FIGUEROA STREET . LOS ANGELES, CALIFORNIA 90012

#### **PUBLIC HEALTH PROGRAMS**

OUGLAS R. STEELE Peputy Director

SARTIN D. FINN, M.D., M.P.H.

Reply refer to: 2615 South Grand Avenue, Room 607 Los Angeles, CA 90007 (213) 744-3223

April 4, 1983

Mr. Dick Papp Apparatus Service Shop 3601 E. La Palma Avenue Anaheim, California 92808

Dear Sir:

POLYCHLORINATED BIPHENOL (PCB) CONTAMINATION OF A FORMER GENERAL ELECTRIC COMPANY FACILITY, 6900 STANFORD AVENUE, LOS ANGELES

On March 8, 1983, a representative of this office inspected the above subject facility in response to information brought to our attention that large quantities of PCB transformer liquid were disposed of at the rear of this facility from 1946 to 1971. On this date and on subsequent inspections of the affected area on March 15 and March 17, 1983, soil and liquid samples were taken at and around a steam cleaning sump opposite the back door to the building. Laboratory analysis of these samples revealed PCB levels ranging from 13 parts per million (ppm) to 1,290 ppm.

The State Department of Health Services defines contaminated materials containing PCB's at a concentration of 50 ppm or greater as a hazardous waste. The improper disposal and improper storage or abandonment of a hazardous waste is a violation of the California Hazardous Waste Control Law.

- 1. You are hereby directed to remove and legally dispose of all materials contaminated with PCB's at the above subject site by May 10, 1983.
- Provide this office, for departmental approval, by April 20, 1983, a plan for decontamination of the above subject site which includes the following items:

- a) The date that sampling and clean-up activities will begin at the site;
- The names and addresses of companies contracted to analyze, decontaminate and transport wastes from the above subject site;
- c) The methods to be used to decontaminate the affected area;
- d) The location of the disposal site;
- e) The date, after clean-up is complete, that sampling will take place to verify decontamination of the site.
- 3. Profice this office by May 20, 1983, a report from a State certified laboratory indicating the decontamination of the site to legal limits and completed copies of all hazardous waste manifests used during the transport and disposal of the contaminated materials.

If you have any questions regarding this notice, please contact Larry Bishop of this office at (213) 744-3223.

Yours truly,

R. J. Demului

R. L. Dennerline, Chief Occupational Health

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# HAZARDOUS MATERIALS SAMPLE ANALYSIS REQUEST

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# HAZARDOUS MATERIALS SAMPLE ANALYSIS REQUEST

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Expleia. Sc.  Date tec'é.  Financia:  PART 1  Signatur  Jangan	Allocation:  Tw 256-83  Ander 1260  = 13 pp  (II; CALIE OF	TIN 257-53  Ancelon 1260 = 1290 pp  F0332331011  Agency/o	Tw 258-83  Tw 258-83  Araclar 10  = 160 fp  Franization  Jons Wisk G	Doo Min x	inclusive da	3-21-83
Expleiant No.  Date rec'd.  Findings:	Allocation:  Tw 256-83  Anchor 1260  = 13 pp   II; Call: 01	TIN 257-53  Ancelon 1260 = 1290 pp  F0332331011  Agency/o	Tw 258-83  Bracker lo  = 160 fp	Doo Min x	inclusive da	3-21-83
Expleids:  Date tec'é.  Financia:  PART 1  Signatur  Lauren	Allocation:  Tw 256-83  Ander 1260  = 13 pp  (II; CALIE OF	TIN 257-53  Ancelon 1260 = 1290 pp  F0332331011  Agency/o	Tw 258-83  Tw 258-83  Araclar 10  = 160 fp  Franization  Jons Wisk G	Doo Min x	inclusive da	3-21-83
Ex vici	Allocation:  Tw 256-83  Ander 1260  = 13 pp  (II; CALIE OF	TIN 257-53  Ancelon 1260 = 1290 pp  F0332331011  Agency/o	Tw 258-83  Tw 258-83  Araclar 10  = 160 fp  Franization  Jons Wisk G	Doo Min x	inclusive da	

## A 5476 13 -

# HAZARDOUS MATERIALS SAMPLE ANALYSIS REQUEST

	PART I:	TIELD SECTE	.c.y	<u> </u>		· ·	· ·
	Callect	= L.Bix Hop	K. CAM BE	iliz Date Sa	7-17-8	<u>}</u>	zivod_
•	_		t .t	Matal Drop	luts	.•	•
•		6900 5/2	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	ci, compeny. d	isposal mite,	etc.	
: *	åddress	6900 )/2	street	city	state	žip	
	Telepho	ne ()		uny Contact_		•	· · · · · · · · · · · · · · · · · · ·
		•			••		
<u> </u>	באי. ב	LB 3-17B	LB 3-17C	LB 3-17D	KC-3-17A	KC 3-1713	1
SUF	II 07	15011.	501/	Soil	Suil	501	
ICI	TION OF	R. Rodd prop.	R. Es. d Prop	Compesite Reposed from	R. Read From	R. Road Prop 3++ E. of Back	
<u>در بح</u>	संबं	100 fts. of sump 10ft from Back		Directly E. ef	Fence \$ 150'. Hof Sungs	Ferer = 100 ft NOF Suny	
	<u>=</u> Ye foe	PCR.	James Land		1 - Jungs	Wot stony	<u> </u>
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<u> </u>	<u>.</u>				•		<b>-</b> ,
	····			•			•
	PART ]	II: LABORATORI	i SECTION	•	•	_	•
	Receive			Title		Date	
	Receive Semple	ed by		EAL LE		_ Cate	
	Receive Semple	ed by		EAL LE			
	Receive Semple No. tec'd.	Allocation:	Tiv 260-83	TW 261-83	TN 362-83	Tw 263-83	
Dite	Receive Semple No. tec'd.	Allocation:	Tiv 260-83	TW 261-83	TN 362-83	Tw 263-83	
Dite	Receive Semple No. tec'd.	Allocation:	Tiv 260-83	TW 261-83	TN 362-83	Tw 263-83	
Dite	Receive Semple No. tec'd.	ed by	Tiv 260-83	TW 261-83	TN 362-83	Tw 263-83	
Dite	Receive Semple No. tec'd.	Allocation:	Tiv 260-83	TW 261-83	TN 362-83	Tw 263-83	
Dite	Receive Semple No. tec'd.	11 by Allocation:  TW 259-83  Procher 1260  76 pp	Tiv 260-83 Anclor 1262 = 444 pm	TW 261-83	TN 362-83	Tw 263-83	
Date Finds	Receive Semple No. tec'd.	11: CHILL: 01	Tiv 260-83 Anclor 1262 = 444 pp	Tw 261-83  Auclon 1260 = 127 pp.	TN 262-83  Archarly60 = 536 pm	Date  Tw 263-83  Brocker 1266  = 78 pp	125/83
Date Finds	Receive Semple No. tec'd.	11: CHILL: 01	Tiv 260-83  Anilor 1262  = 444 pp  F03523310:1  Agency/o:	Twoder-83  Auclon 1260  = 127 April	TN 262-83  Archarly60 = 536 pm	Date Tw 263-83  Anoclor 1266  = 78 pp  - Nece p	:/35/83 es
Date Finds	Receive Semple Semple Semple Tec'd.	11: CHILLE OF	Tiv 260-83  Anilor 1260  = 444 pp  F0352331011  Agency/0:  Hown	Family Mack	TN 262-83  Archalto = 536 pm	Date  Tw 263-83  Aroclor 1266  = 78 pp	65/83 8.21-83
Date Finds	Receive Semple Semple Semple Tec'd.	11: CHILL: 01	Tiv 260-83  Anilor 1260  = 444 pp  F0352331011  Agency/0:  Hown	Twoder-83  Auclon 1260  = 127 April	TN 262-83  Archalto = 536 pm	Date Tw 263-83  Anoclor 1266  = 78 pp  - Nece p	65/83 8.21-83
Date Finds	Receive Semple Semple Semple Tec'd.	11: CHILLE OF	Tiv 260-83  Anilor 1260  = 444 pp  F0352331011  Agency/0:  Hown	Family Mack	TN 262-83  Archalto = 536 pm	Date  Tw 263-83  Aroclor 1266  = 78 pp	65/83 8.21-83

Surface Sampling Location of Former GENERAL ELECTRIC FACILITY 6700 StanfordAK. L.A March 8, 15, 17, 1983. KC 3-17A 536 ppm 78 ppm 1 LB 3-80 LB 3-2C LB 3-8 F. 6900 ENDURA METAL PRODUCTS LB 3-15A 11163-00 11165 183-93 183-911 L B3-15E 1338E 1200 pm LB 3 17C LB3-173 75ppm

Stanford AV.

EXHIBIT C

Received: 21 FEB 85 Reported: 15 MAR 85

Bechtel National, Inc. Fifty Beale Street, P.O. Box 3965 San Francisco, CA 94119

ATTN: Kenneth E. Barr

Project: ENDURA METALS

Purchase Order: FIN85-25

OG NO	SAMPLE DESCRIPTION, SOIL SAMPLES					DATE SAMPLED		
2-253-1 2-253-2 2-253-3 2-253-4 2-253-5 253-6	A-1 A-2 A-3 B-1 B-2 E-3		: :					21 FEB 85 21 FEB 85 21 FEB 85 21 FEB 85 21 FEB 85 21 FEB 85
ARAMETER			02-253-1	02-253-2	02-253-3	02-253-4	02-253-5	02-253-6
Date Extra Date Analy Aroclor 12 Total PCE	acted //zed 221, mg/kg 232, mg/kg 242, mg/kg 248, mg/kg 254, mg/kg 260, mg/kg 262, mg/kg		03/03/85 03/04/85 (0.5 (0.5 (0.5 (0.5 (0.5 0.6 (0.5	03/03/85 03/04/85 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5	03/03/85 03/04/85 (0.5 (0.5 (0.5 (0.5 (0.5 (0.5 (0.5	03/03/85 03/04/85 <5 <5 <5 <5 <5 16 <5	03/03/85 03/04/85 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5	03/03/85 03/04/85 (0.5 (0.5 (0.5 (0.5 (0.5 (0.5

Received: 21 FEB 85

Reported: 15 MAR 85

Bechtel National, Inc. Fifty Beale Street, P.O. Box 3965 San Francisco, CA 94119

ATTN: Kenneth E. Barr

Purchase Order: FIN85-25

Project: ENDURA METALS

LOG NO	SAMPLE DESCRIPTION	, SOIL SAMP	LES		·	DA	TE SAMPLED
02-253-7 02-253-8 02-253-9 02-253-10 02-253-11 -253-12	C-1 C-2 C-3 C-4 D-1 D-2						21 FEB 85 21 FEB 85 21 FEB 85 21 FEB 85 21 FEB 85 21 FEB 85
PARAMETER		02-253-7	02-253-8	02-253-9	02-253-10	02-253-11	02-253-12
Polychloring Date Extra Date Analy Aroclor 12	zzed 016. mg/kg 021. mg/kg 0232. mg/kg 0242. mg/kg 0248. mg/kg 0254. mg/kg 0260. mg/kg	03/03/85 03/04/85 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5 3.0 <0.5	03/03/85 03/04/85 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5 0.6 <0.5	03/03/85 03/04/85 <0.5 <0.5 <0.5 <0.5 <0.5 1.6	03/03/85 03/04/85 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5	03/03/85 03/04/85 <10 <10 <10 <10 <10 52 <10	03/03/85 03/04/85 <10 <10 <10 <10 <10 310 <10 310

Received: 21 FEB 85

Reported: 15 MAR 85

Bechtel National, Inc. Fifty Beale Street, P.O. Box 3965 San Francisco, CA 94119 Purchase Order: FIN85-25

ATTN: Kenneth E. Barr

Project: ENDURA METALS

LOG NO SAMPLE DESCRIPTION	ON, SOIL SAMP	PLES			- DA	TE SAMPLED
02-253-13 D-3 02-253-14 D-4 02-253-15 E-1 02-253-16 E-2 \$\text{P}^2-253-17 E-3 -253-18 E-4						21 FEB 85 21 FEB 85 21 FEB 85 21 FEB 85 21 FEB 85 21 FEB 85
PARAMETER	02-253-13	02-253-14	02-253-15	02-253-16	02-253-17	02-253-19
Polychlorinated Biphenyls Date Extracted Date Analyzed Aroclor 1016, mg/kg Aroclor 1221, mg/kg Aroclor 1232, mg/kg Aroclor 1242, mg/kg Aroclor 1248, mg/kg Aroclor 1254, mg/kg Aroclor 1260, mg/kg Aroclor 1260, mg/kg Totîl PCB's, mg/kg	03/03/85 03/04/85 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5 4.0	03/03/85 03/04/85 <0.5 <0.5 <0.5 <0.5 <0.5 1.8	03/05/85 03/06/85 <10 <10 <10 <10 <10 110 <10	03.05.85 03.06.85 (2 (2 (2 (2 (2 13 (2 13	03/05/85 03/06/85 <5 <5 <5 <5 <5 32 <5	03/05/85 03/06/85 <2 <2 <2 <2 <2 12 <2 12

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Bechtel National, Inc. Fifty Beale Street, P.O. Box 3965 San Francisco, CA 94119

Purchase Order: FIN85-25

ATTN: Kenneth E. Barr

Project: ENDURA METALS

LOG NO SAMPLE DESCRI	SAMPLE DESCRIPTION, SOIL SAMPLES					ATE SAMPLED
02-253-19 F-1 02-253-20 F-2 02-253-21 F-3 02-253-22 G-1 02-253-23 G-2 253-24 G-3						21 FEB 85 21 FEB 85 21 FEB 85 21 FEB 85 21 FEB 85 21 FEB 85
PARAMETER	02-253-19	02-253-20	02-253-21	02-253-22	02-253-23	02-253-24
Polychlorinated Biphenyls Date Extracted Date Analyzed Aroclor 1016, mg/kg Aroclor 1221, mg/kg Aroclor 1232, mg/kg Aroclor 1242, mg/kg Aroclor 1248, mg/kg Aroclor 1254, mg/kg Aroclor 1260, mg/kg Aroclor 1260, mg/kg Total PCB's, mg/kg	03/05/85 03/06/85 (30 (30 (30 (30 (30 290 (30	03/05/85 03/06/85 <2 <2 <2 <2 <2 <2 <2 20 <2	03/06/85 03/07/85 (1 (1 (1 (1 7.5 (1 7.5	03/06/85 03/07/85 <100 <100 <100 <100 <100 1100 <100	03/06/85 03/07/85 <10 <10 <10 <10 <10 120 <10	03/06/85 03/07/85 <1 <1 <1 <1 <1 10 <1

LOC NO: PS5-02-253

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Bechtel National, Inc. Fifty Beale Street, P.O. Box 3965 San Francisco, CA 94119 Purchase Order: FIN85-25

ATTN: Kenneth E. Barr

Project: ENDURA METALS

LOG NO SAME	PLE DESCRIPTION	, SOIL SAME	PLES			D/	ATE SAMPLED
02-253-25 H-1 02-253-26 H-2 02-253-27 H-3 02-253-28 I-1 -253-29 I-2 253-30 J-1							21 FEB 65 21 FEB 65 21 FEB 85 21 FEB 85 21 FEB 85 21 FEB 85
PARAMETER	,	02-253-25	02-253-2€	02-253-27	02-253-28	02-253-29	02-253-30.
Polychlorinated Date Extracted Date Analyzed Aroclor 1016, m Aroclor 1232, m Aroclor 1242, m Aroclor 1248, m Aroclor 1254, m Aroclor 1260, m Aroclor 1262, m Total PCB's, mg	ng/kg ng/kg ng/kg ng/kg ng/kg ng/kg ng/kg	03/06/85 03/07/85 <10 <10 <10 <10 <10 810 <10 820	03/06/85 03/07/85 <5 <5 <5 <5 <5 <5	03/06/85 03/12/65 <5 <5 29 <5 29 <5 28	03/06/85 03/12/85 <5 <5 43 <5 120 <5	03/06/85 03/07/85 <10 <10 <10 <21 <10 <10 27 <10 48	03/06/85 03/12/85 <5 <5 <5 <5 <5 <5 29

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ATTN: Kenneth E. Barr

Project: ENDURA METALS

LOG NO SAMPLE	DESCRIPTION, SOIL SA	AMPLES			DA	ATE SAMPLED
02-253-31 K-1 02-253-32 L-1 02-253-33 L-2 02-253-34 M-1 02-253-35 M-2 -253-36 N-1		·	· .			21 FEB 85 21 FEB 85 21 FEB 85 21 FEB 85 21 FEB 85 21 FEB 85
PARAMETER	02-253-3	31 02-253-32	02-253-33	02-253-34	02-253-35	02-253-36
Polychlorinated Bi Date Extracted Date Analyzed Arcclor 1016, mg/l Aroclor 1221, mg/l Aroclor 1232, mg/l Aroclor 1242, mg/l Aroclor 1248, mg/l Aroclor 1254, mg/l Aroclor 1260, mg/l Aroclor 1262, mg/kg	03/06/8 03/13/8 kg	35 03/13/85 1 (50 1 (50 9 2300 1 (50 1 (50 6 150 1 (50	03/06/85 03/13/85 <1 <1 <1.6.5 <1 <1 14 <1 21		(1 (1 (1	03/06/85 03/12/85 <10 <10 <10 43 <10 <10 320 <10 360

Received: 21 FEB 85 Reported: 15 MAR 85

Bechtel National, Inc. Fifty Beale Street, P.O. Box 3965 San Francisco, CA 94119

Purchase Order: FIN85-25

ATTN: Kenneth E. Barr

Project: ENDURA METALS

LOG NO SAMPLE DESCRIPTION	, SOIL SAME	LES	•		DZ	TE SAMPLED
02-253-37 N-2 02-253-38 O-1 02-253-39 O-2 02-253-40 O-3 02-253-41 P-1 -253-42 P-2						21 FEE 85 21 FEB 85 21 FEE 85 21 FEE 85 21 FEE 85 21 FEE 85
PARAMETER	02-253-37	02-253-38	02-253-39	02-253-40	02-253-41	02-253-42
Polychlorinated Eiphenyls Date Extracted Date Analyzed Aroclor 1016, mg/kg Aroclor 1221, mg/kg Aroclor 1232, mg/kg Aroclor 1242, mg/kg Aroclor 1248, mg/kg Aroclor 1254, mg/kg Aroclor 1254, mg/kg Aroclor 1260, mg/kg Aroclor 1262, mg/kg Total PCB's, mg/kg	03/06/85 03/12/85 <10 <10 <10 <10 <10 <10 250 <10 330	03/06/85 03/12/85 (0.5 (0.5 (0.5 (0.5 (0.5 9.2 (0.5 9.2	03/06/85 03/12/85 <0.5 <0.5 <0.5 <0.5 <0.5 3.8	03/08/85 03/11/85 (0.5 (0.5 (0.5 (0.5 (0.5 (0.5	03/08/85 03/11/85 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5	03/08/85 03/11/85 (0.5 (0.5 (0.5 (0.5 (0.5 1.8 (0.5

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ATTN: Kenneth E. Barr

Project: ENDURA METALS

OG NO SAMP	LE DESCRIPTION, SOIL SAM	PLES			D	ATE SAMPLED
)2-253-43 P-3 )2-253-44 Q-1 )2-253-45 Q-2 )2-253-46 R-1 )2-253-47 R-2 253-48 S-1		<u> </u>				21 FED 85 21 FED 85 21 FED 85 21 FED 85 21 FED 85 21 FED 85
'ARAMETER	02-253-43	02-253-44	02-253-45	02-253-46	02-253-47	02-253-48
Polychlorinated In Date Extracted Date Analyzed Aroclor 1016, mg Aroclor 1221, mg Aroclor 1242, mg Aroclor 1248, mg Aroclor 1254, mg Aroclor 1260, mg Aroclor 1262, mg Total PCB's, mg Aroclor 1262, mg Total PCB's, mg Aroclor 1262, mg Aroclor 126	03/08/85 03/11/85 3/kg	03/11/85 <0.5 <0.5 <0.5 <0.5 <0.5 <2.3	03/08/85 03/11/85 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5 3.5	03/08/85 03/11/85 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5	03/08/85 03/11/85 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5 4.2 <0.5	03/08/85 03/11/85 <0.5 <0.5 <0.5 <0.5 <0.5

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Bechtel National, Inc.

Fifty Beale Street, P.O. Box 3965

San Francisco, CA 94119

ATTN: Kenneth E. Barr

Purchase Order: FIN85-25

Project: ENDURA METALS

OG NO	SAMPLE DESCRIPTION, SOIL SAMPLES			D2	ATE SAMPLED
2-253-49 2-253-50 2-253-51 2-253-52	S-2 S-3 T-1 ROCF				21 FEE 85 21 FEE 85 21 FEE 85 21 FEE 85
METER	·	02-253-49	02-253-50	02-253-51	02-253-52
blychlorin Date Extra Date Analy Aroclor 10 Aroclor 12 Total PCB	zed 16. mg/kg 121. mg/kg 132. mg/kg 142. mg/kg 148. mg/kg 154. mg/kg 160. mg/kg 160. mg/kg 160. mg/kg	03/08/85 03/11/85 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5	03/06/85 03/12/85 <100 <100 <100 <100 <100 330 <100 2200	03/08/85 03/11/85 <10 <10 <10 4.4 <10 <10 22 <10 26	03/08/85 03/11/85 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5

TABLE 3
SUMMARY OF ANALYSIS RESULTS

		AROCLOR		
SAMPLE #	_ 120	1242*	TOTAL PC	<u>B</u>
<b>A1</b>	•	.6 -	.6	
A2		-	.0	
. A-3	-	• • • • • • • • • • • • • • • • • • •	<del>-</del>	
	-	-	•	
B1 B2	16 2	-	16	
	2.		2.5	
B3	_	<del>-</del>	_	
C1	3	_	3	
C2		-	.6	
C3	1.		1.6	
C4		.5 -	<b>. 5</b>	
D1	52		52	
D2	310	-	310	
D3	4	-	4	
D4	1.	8 . –	1.8	
E1	110	-	110	
E2	13	<del>-</del>	13	
<b>E3</b>	32	<u>-</u>	32	
E4	12	<u>-</u>	12	
F1	290	-	290	
F2	20	· <b>-</b>	20	
F3	7.	5 -	7.5	
G1	1100	_	1100	
G2	120	_	120	
G3	10	_	10	
н1	810	10	820	
Н2	38	-	38	
н3	28	29	57	
11	120	43	160	
12	27	21	48	
J1	29		29	
~~	2,3	<b>_</b>		

\*For locations of samples containing Aroclor 1260 only see Figure 4
\*\*For locations See Figure 3

## TABLE 3 (Continued)

#### SUMMARY OF ANALYSIS RESULTS

#### AROCLOR

•	<u>~</u>	ROCLUR	
SAMPLE #	<u>1260*</u>	1242**	TOTAL PCB
K1	4.6	2.9	7.5
L1	150	2300	2500
L2	14	6.5	21
H1	63	47	110
M2	3.3	<del>-</del> ,	3.3
NI	320	43	360
N2	250	80	330
01	9.2	-	9.2
02	3.8	, <del>-</del>	3.8
03	5.1	· <del>-</del> ·	5.7
P1	3	-	3
P2	1.8	• · · · · · · · · · · · · · · · · · · ·	1.8
P3	3.9	<del>-</del>	3.9
Q1	2.3	-	2.3
Q2	. <b>3.5</b>	_	3.5
R1	-	· _	-
R2	4.2	-	4.2
S1	11	-	11
<b>S2</b>	1.5	· _	1.5
S3***	3300	1900	5200
<b>T1</b>	22	4.4	26
Roof	5	-	5

<sup>\*</sup>For locations of samples containing Aroclor 1260 only see Figure 4
\*\*For locations See Figure 3

<sup>\*\*\*</sup>Sample Verified at 3700 (1260) and 2400 (1242)

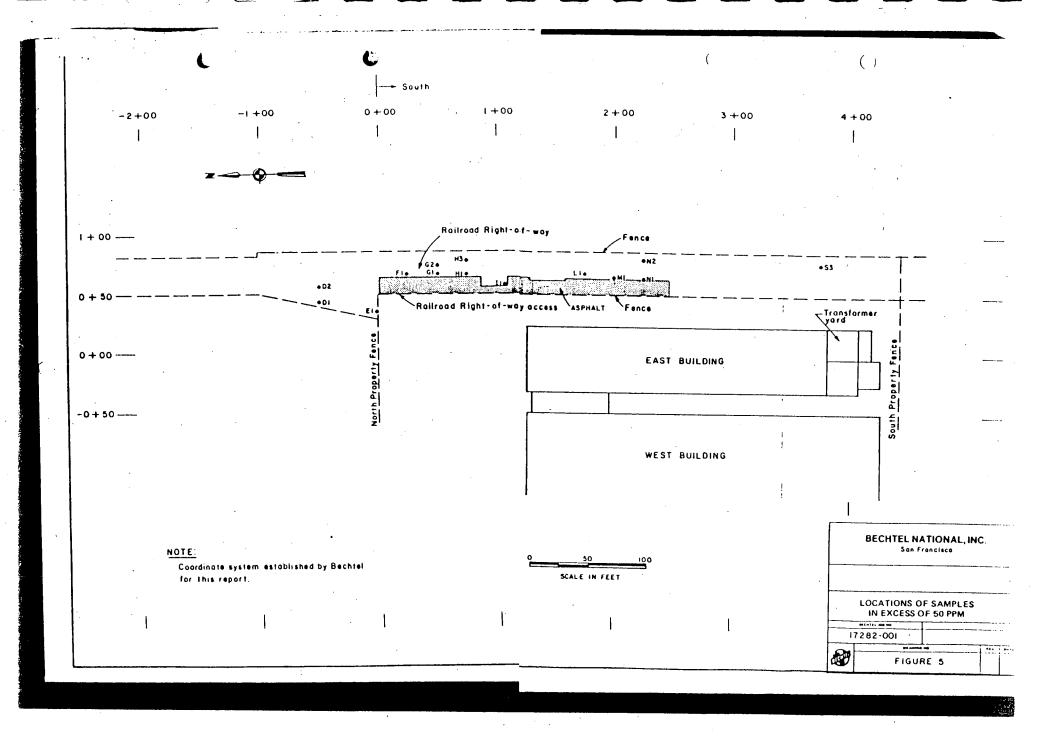
TABLE 5

PCB CONTAMINATED SAMPLES

GREATER THAN 50 PPM

	ARC	OCLOR	
SAMPLE #	<u>1260*</u>	1242**	TOTAL PCB
<b>D1</b>	52	· _	52
D2	310	_	310
<b>E</b> 1	110	<b>-</b> ,	110
F1	290	· <b>_</b>	290
<b>G1</b>	1100	_	1100
G2	120	-	120
н1	810	10	820
нз	28	29	57
11	120	43	160
L1	150	2300	2500
Ml	63	47	110
N1	320	43	360
N2	250	80	330
<b>S</b> 3	3300	1900	5200
•			

<sup>\*</sup>Sample verified at 3700 (1260) and 2400 (1242)



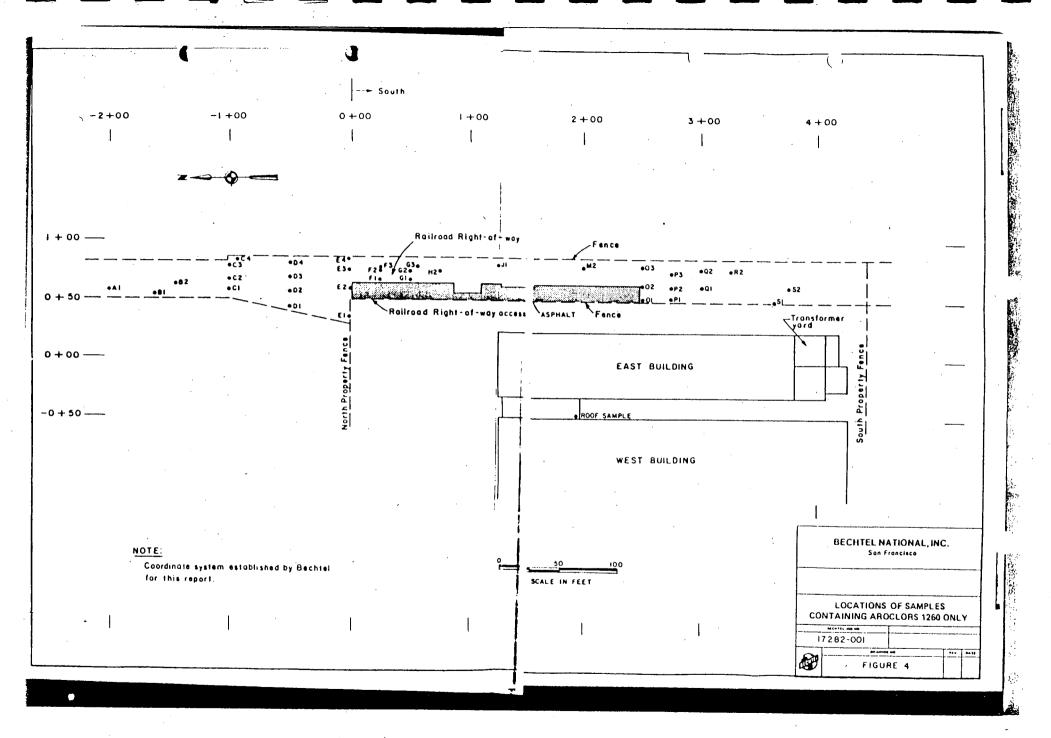


EXHIBIT D

## PCB Wipe Samples:

Wipe samples collected had concentrations ranging from 5 micrograms to over 4,000 total micrograms per wipe. A more detailed account of the concentrations are listed below:

LOCATION	HIGHEST CONCENTRATION (total ug)
Office roof area	65.0
Front building; concrete floor	897.0
Front building; cracks	40.8
Back building; concrete floor	4,100.0
Back building; cracks	51.0
East side of back building	53.0
Railroad track area	41.0
Forklift wheel; front building	76.0
·	

#### PCB Bulk Samples:

The majority of samples collected were bulk samples or Type B (as expressed in the result section). The following chart gives a representation of the general area sampled as well as the concentrations present.

Front building; I foot square area Front building Front building; cracks Back building Back building West exit grate; back building Area between buildings SE corner of facility	HIGHEST CONCENTRATION ( ppm)
Front building Front building; cracks Back building Back building West exit grate; back building Area between buildings	340.0
Back building Back building West exit grate; back building Area between buildings	/ 2,620.0
Back building West exit grate; back building Area between buildings	/ 879.0
West exit grate; back building Area between buildings	/ 9,900.0
Area between buildings	3,200.0
Area between buildings	15,000.0
	485.0
on corner or facility	150.0
NE corner of facility	130.0
Sump area	571.0
Beneath lid of underground tank	1,600.0

### PCB Core Samples:

Core samples of surface cement were analyzed for PCBs and the concentrations representing the first 1/2" of material are provided below.

	LOCATION	HIGHEST CONCENTRATION (ppm)		
	Sump area	980.0		
4	Concrete east of back building	4,080.0	•	
;	Back building	129.0		
	Area between front and back buildings	387.0		
]	Front building	105.0	! !	

2,3,7,8-TCDD Analysis performed by Science Applications

Location Concentration

Front Building (see Appendix A)

None Detected

PCDD/PCDF:
Analysis performed by Brehm Laboratory

Location	Туре	Concentration ppb			
Back Building Ceiling Area	2,3,7,8-TCDD  total tetra dioxin  total penta dioxin  /total hexa dioxin  total hepta dioxin	$ \begin{array}{c} 0.498 \\ 30.1 \\ 93.6 \\ 75.6 \\ 69.6 \\ 11.6 \end{array} $			
	total octa dioxin  2,3,7,8-TCDF  total tetra furan  total penta furan  total hexa furan  total hepta furan  total octa furan	PLIF 166.0 166.0 67.1 62.2 20.9			

EXHIBIT E



#### OCCUPATIONAL & ENVIRONMENTAL HEALTH SERVICES

1401 Warner Ave., Sutte A . Tustin, California 92680 . (714) 669-0620

July 29, 1985

Mr. Bob Henchen ENDURA MFTAL PRODUCTS 6900 Stanford Avenue Los Angeles, CA 90001

Dear Mr. Menchen:

Enclosed please find a copy of a table of drta in which the concentrations of CDDs/CDFs present in the Endura Metal Products samples which were sent to the Brehm Laboratory for analysis are listed. Analyses of extracts of these same samples are being completed in which the concentrations of PCBs and PCP are being quantitated and these data will be telephoned to you as soon as possible. Our complete report will follow in about 10 days.

Thank you for your patience.

Sincerely

Don R. Thorne, Ph.D. Toxicologist/Principal

DRT:pc/RH:107 Enclosure

#### BADIN JASONITORY, MAIGHT STATE UNIVERSITY, SAFTON, ONID 45425

RESULTS OF HER LOSS AND ISES OF SANDES FOR TETRICALCULATED THALLOW OCTACHUNICATED DIREND-BROWNER (CORN., DIRENDO JAMES (CORN., & \$.7.6 FETRALCO) & &. \$.7.6 FETRALCO

Since since of 2376 (XIZ Surror Tetra 2378 pate 1330 mm) Teral Total Total Total Total IX:12 2378 370:4
Tetra Penta Neva worts Octo OCDO Tetra 2378
CGOs CDOs CDOs CDO CDO fotal fotal fotal fotal fotal 1.65 56.2 -4.67 7.37 76.9 40 46.8 97.5 90 80 80 80 80 101.8 80 51.4 6.8248 8.8467 8.8779 6.8779 6.8465 10 46.4 92.6 10 40 10 10 47.2 10 47.3 6.6055 6.6054 8.6251 8.644 8.6251 8.66531 2.31 4.69 (00.0 2.02 00.9 IE.1 45.8 90.2 63.9 17. 10 67.7 94.6 0.0102 10 0.133 0.264 0.462 194.6 (0.0319 9).5 0.163 0.167 0.325 0.173 0.124 40 98.8 93.4 6.2653 40 6.2614 6.6547 6.457 97.4 (6.8157 129.8 6.653 6.2667 6.142 6.652 6.2857 6.467 4.9 92.6 AD AD NO 6.413 1.16 53.9 AD 4.5 NO 6.899 2.54 6.429 6.634 6.256 6.533 6.665 6.191 4.225 E- 10 E2 S2.9 AO 10 E279 E28 E48 S2.4 (1.37) NE 8 E75 S.19 17.3 13.1 13.4 6.452 10 Q.7 86.8 100 00 1.64 3.77 13.5 140.8 (1.67 36.4 14.6 15.7 31.6 29.1 35.4 8.119 10 46.5 79.5 10 10 8.286 6.327 33.8 (2.41) 44.5 8.16 5.29 2.28 1.28 8.654 8.825 8.815 33 10 52.6 126.5 10 10 6.267 6.559 1.21 73.3 8.6166 6.0181 8.6565 ( 1.39 **)**19.5 6.52 13.2 29.7 16.7 21.3 40 67.7 91.8 40 60 60 8.263 1.00 60.8 (A.8176 91.4 8.429 6.432 6.646 6.113 60 6.6626 6.663 6.6626 6.113 60 6.124 94515-12 (C)5-12-0 10 52.4 94.8 8.6756 10 8.446 8.271 8.253 64.8 8.4743 15.3 76.1 76.6 25.2 7.49 74.6 27.4 744.6 ₽615-1 €55-1 1.97 167 546 69.0 (7254 100)+

- a. The designation of indicates "More Resected" in excess of the nintered detectable concentration which is listed directly polar the MC designation.
- a. Whices etherwise indicated, the concentrations listed for 2,3,7,8 TOF could include concrebations from consisting TOF sectors.
- E Sufficie sample. A separate alignet of the sample was weighed, extracted, and the concentrations of CD9s/CDFs were quantitated in a separate analysis.
- d. Poor recoveries for the 12012-2,3,7,8-7000 and 370143,7,8-700F internal standards were obtained due to interferences.
- o. MED 5-12-0 is a sample aliquet which was obtained from the surface of the wood block (the point on the surface). MED 5-12-1 is a sample aliquet which was obtained from the sub-surface (by drilling into the block) of the wood block.

#### LOCATION OF SAMPLES

East (back) building, ceiling - repeat of positive sample SP0515-2 East (back) building, ceiling - above easternmost double doors SP0515-3 East (back) building, floor - general area East (back) building, floor - crack or grate area SP0515-4 West (front) building, ceiling - Les Menchen's office SP0515-5 West (front) building, floor - general area SP0515-6 West (front) building, floor - crack or grate area SP0515-7 SP0515-8 Rear of east (back) building, sump area SP0515-9 Rear of east (back) building, asphalt area - NE corner near railroad tracks SP0515-10 East (back) of building, product "cardboard" sample SP0515-11 West (front) building, product "wipe sample" SP0515-12 East (back) building - clean wood sample from ceiling SP0515-13 Control; clean soil sample from outside of building upstream of contamination

Additional control samples:

- a) Ferformance sample
- b) Laboratory blank

LARS-OWE KJELLER Umeå Universitet 901 87 UMEÅ Sweden

Umeå 85-08-13

Bechtel National, Inc. Att: Kennet E. Barr

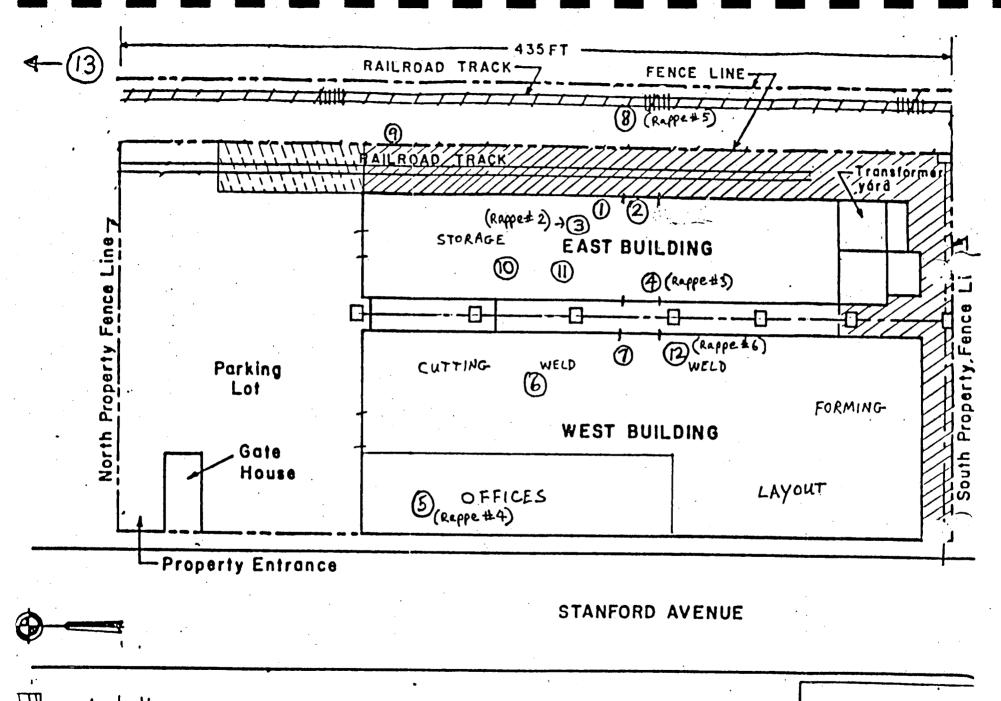
# Levels of dioxins and dibensofurans.

MPR 455:	1	5	3	4	5	6
Att nr800515	1	3	4	<i>े</i> 5	<b>a</b> )	12
2, 3, 4, 8-/	~9/g	rg/g	3/3	2 mg	~5/8	~31g
	• • •	,		_		
2.3.7.8-TCDF Tot. TCDF's	- 18	1.1	3.2	1.5	0.06	3.5
Tot. TCDF'S	_ 58	E. 4	19	5. €	0.21	10
REC 13C-2378-TCDF	57	69	33	83	104	54
2.3.7.8-TCDD	NA .	NA	NA	NA	NA	NA
Tot. TCDD's	NA .	NA	NA	NA	NA	NA
1.2.3.4.8-/						
1.2.3.7.8-PnCDF	39	5.5	36	18	0.13	15
2.3.4.7.8-PriCDF	96	9.4	21	21	0.44	29
Tot. PriCDF's	740	130	230	140		
	740	150	230	140	2.8	150
REC 13C-12378-PriCDF	EE	<b>69</b>	53	87	100	71
1.2.3.7.8-PriCDD	0.77	0.03	ND	ND	ND	ND
Tot. PriCDD's	25	0.45	ND	ND	ND	CN
1.2.3.4.7.9-/			•			•
1.2.3.4.7.8-HxCDF	9.2	2.8	14	12	0.05	8.4
1.2.3.6.7.8-HxCDF	4.3	0.42	2.5	1.2	0.01	1.1
1.2.3.7.8.9-HxCDF	3.3	0.78	7. 1	2.5	0.02	2.9
2.3.4.6.7.8-HxCDF	9.7	0.72	2.9	1.5	0.02	1.1
Tot. HxCDF's	68	26	78	40	0.29	30
REC 13C-123478-HxCDF	64	<b>6</b> 6	31	94	109	75
1.2.3.4.7.8-HxCDD	3.0	0.19	0.32	ND.	ND	
1.2.3.6.7.8-HxCDD	<b>5.</b> 2	0.27	1.6		ND	0.04
1.2.3.7.8.9-HxCDD	1.1			0.85	ND	0.17
Tot. HxCDD's		0.03	0.14	ND	ND .	ND
TACED S	45	1.5	6.0	3. 1	0.02	0.71
Tot. HpCDF's	31	13	64	41	0.25	48
REC 13C-1234678-HpCDF	59	49	44	81	94	58
Tot. HpCDD's	20	3.7	4.8	€. 0	0.04	0.39
OCDF	5. 1	15	89	53	0.34	77
REC 13C-OCDF	49	23	40	56	77	31
acro.						

The values are given in mg/g. for sample 1,2,3.5,6 and for sample 4, mg. tot. in sample

NA = Not Analyzed

ND = Not Deteted, Detection limit 0.01-0.02 mg/g.



M Asphalt

BECHTEL N

NAI

Concrete

# EXHIBIT I

# Memorandum

Regional Section Chiefs Community Relations Coordinators Site Mitigation Chiefs RECEIVED Date : October 6, 1986

Subject: Site Mitigation Community Relations

Through: Dave Willis

Marcia Murphy, Acting Chief STANCES

Community Relations Section HEALTH SER.

As you are aware, the Division's community relations program was recently reviewed by the Auditor General. I am enclosing a copy of the report for each region.

'86 OCT 10 PM 3 15

The Auditor General stated that community relations plans should be developed for all state hazardous waste cleanup sites. He recommended that "to improve its community relations program for hazardous waste cleanup sites, the department should ensure that the toxics division establish uniform methods for developing and reviewing community relations plans. Additionally, the department should ensure that individuals skilled in community relations develop or review all proposed community relations plans."

To assist you in working with your zone contractors and responsible parties until procedures and handbooks can be developed, I have included an outline of the required elements of a community relations plan. The community relations plan should be prepared in the early stages of the site work, preferably at the paper review stage, before any on-site investigation work begins. I have attached an example of sample language for a task order (see Attachment 1). The guidelines that follow are from EPA guidelines (reference: Community Relations in Superfund: A Handbook, September 1983), and the California. Health and Safety Code Section 25356.1(d) on remedial action plans (RAP).

COMMUNITY RELATIONS PLAN OUTLINE FOR RESPONSIBLE PARTIES AND ZONE CONTRACTORS

# Introduction - describes the following:

- Purpose of the Community Relations Plan (CRP)
- Which agencies have oversight responsibilities 0
- How information was obtained (e.g. interviews) Who was interviewed for the information in the CRP (this:
- might be included in an appendix instead of the introduction) How the plan is divided/structured (i.e. main catagories of information)

# B. Community Relations Background

- Site description (include area map and site maps)
- Site history or background
- History of community involvement
- Potential issues and community concerns

Regional Section Liles
Community Relations Coordinators
Site Mitigation Chiess
Page 2

- C. Objectives of the Community Relations Program
  - o Based on the issues and community concerns, describe the objectives of the community relations program
- D. Community Relations Techniques
  - o For each objective, describe the community relations technique to be used and the purpose of the technique
  - o An information repository must be established for every site. This is a location, often a public library, near the site/affected community where the public has access to reports, fact sheets, etc.
  - o Circulate the draft RAP for 30 days for public comment\*
  - o Develop a mailing list which at a minimum includes contiguous property owners, local and state agencies and notify them by direct mail of actions proposed in draft RAP\*
  - o Publish a notice of draft RAP availability for public review in a newspaper of general circulation in the area affected\*
  - o Post notices in location where proposed removal or remedy will occur#
  - o Hold one or more public meetings on the draft RAP#
- o Based on public comment, revise draft RAP if appropriate\* (\*Requirements in California Health & Safety Code Section 25356.1(d))
- E. Staffing Plan and Schedule
  - o If more than one entity has responsibility for the implementation of the CRP, list each community relations activity and who has the responsibility (ie., DHS, RP, Zone Contractor, EPA, Water Board, etc., whoever is responsible)
- F. Schedule of Community Relations Activities
  - o Using a matrix format, list "Community Relations Activities" on the left column, and "Technical Milestones" across the top, filling in the indications of which community relations activities correspond with each milestone (see attachment 2)
- G. Mailing Lists
  - o Appendices of mailing lists must include names, titles, addresses and telephone numbers of key contact people (this might be the same as the advisory committee list if there is one) including:

Regional Section Chiefs Community Relations Coordniators Site Mitigation Chiefs Page 3

Technical committee members (if one exists)
Elected officials
Local residents/contiguous property owners
Local and state agencies
Public interest/environmental groups (if applicable)
Informations repositories
Media contacts

I hope these guidelines will assist you in the development and implementation of community relations plans until a handbook can be developed. I am also available to assist in the review of task orders, workplans and community relations plans until site mitigation community relations specialists are available in field offices.

In addition, you should be aware that I will be working with Stan Phillippe to develop a statement of work for zone contractors to address community relations needs for bond lead sites. I expect this will include such tasks as assessing whether any form of a community relations plan currently exists, developing a preliminary mailing list, identifying at least one information repository location and preparing a fact sheet about the site.

Please contact me at 8-454-1789/(916) 324-1789 if you have any

Attachments Enclosure GENERAL ELECTRIC COMPANY

FAIRFIELD, CONNECTICUT 06431

BRYCE I. MACDONALD
MANAGER-REMEDIAL PROJECTS

(203) 373-3317

April 20, 1987

Anastacio G. Medina, Chief Hazardous Waste Control Program County of Los Angeles - Department of Health Services 2615 South Grand Avenue, Room 607 Los Angeles, CA 90012 RECEIVED

APR 2.2 1987

Dear Mr. Medina:

As you know, in March, 1986, our consultants conducted an extensive sampling program at the former Endura Metal Products facility at 6900 Stanford Avenue, Los Angeles, with primary attention on dibenzofurans and dibenzodioxins. I am pleased to enclose herewith a copy of the report prepared by Daniel P. Boyd and Company summarizing the results of their work. You may recall that we consulted with Dr. Stevens at DOHS while planning this project, and we have reviewed the results with him.

We suggest a meeting with you in a month or so to review the overall status of cleanup at the Stanford Avenue site. First, we seek your acceptance of the conclusions in the Executive Summary of the Daniel P. Boyd Report. In addition, we propose to review with you our plans for the following:

- 1. Removal of underground tanks
- 2. PCB cleanup along the rail spur right of way
- 3. Additional testing for PCBs and possible additional cleanup on the site. Our objective is to reach an understanding with you on what criteria you feel must be met to permit your office to state that the site has been cleaned sufficiently that we can offer the property for sale and transfer title.

I will call you on or about May 1 to arrange a meeting date.

B. I. MacDonald

Very truly yours

BIM:jkl Enclosure

cc: J. F. Aher w/o report

K. Barr w/o report

√ J. T. Harrsen with report
W. P. Thornton w/o report

BRYCE I MACDONALD

203 373 33:0

December 12, 1985

Anastacio G. Medina, Chief Hazardous Waste Control Program County of Los Angeles - Department of Health Services 2615 South Grand Avenue, Room 607 Los Angeles, CA 90012

Dear Mr. Medina:

This will respond to your letter of November 19, 1985 addressed to Mr. Paul Schatz, in which you have asked that we undertake certain actions at the former Endura Metal Products property, 6900 Stanford Avenue, Los Angeles.

You have asked that we provide an impermeable protective cover in the off-site contaminated areas. We have instructed our engineering consultant to prepare plans and specifications for this work, and we will submit those plans to your office as soon as possible. We have contacted the owners of the property, seeking their permission to do this work. When we have their concurrence, we will so advise you, and we then can discuss a time schedule to do the work.

It is not clear from your letter exactly how we are to go about determining the standard to be used in developing an acceptable PCB decontamination plan. We are generally familiar with the draft document titled "California site migration decision tree, . ." However, it will be most helpful if you will provide us with the name(s) of the person or persons at DOHS with whom we should be discussing the resolution of this question.

You have asked that we provide you with a sampling plan to determine residual PCB, 2,3,7,8 TCDF and 2,3,7,8 TCDD levels on and off site.

Prior to receiving your letter, we had decided to undertake such a program, and we have initiated plans to do so. Our consultants are meeting today with Dr. Stevens at DOHS to review our work plan, and we expect to proceed with the work promptly after we have reached agreement with Dr. Stevens.

We do not have a copy of the Brehm Laboratory report of their results from the TCDF and TCDD sampling program earlier this year. It will be difficult for us to complete our overall sampling program until we have had an opportunity to review their results, and we ask that you send us a copy of their report.

As you know, Endura Metal Products is in the process of terminating their operations at the Stanford Avenue facility, and they plan to complete their shutdown by January 31, 1986.

Very truly yours,

BIM:jkl

L. L. Rishop cc:

P. C. Schatz

K. E. Barr bcc:

J. H. Claussen

S. B. Hamilton

T. H. Milby



# COUNTY OF LOS ANGELES • DEPARTMENT OF HEALTH SERVICES

313 NORTH FIGUEROA STREET + LOS ANGELES, CALIFORNIA 90012

RECEIVED

PUBLIC HEALTH PROGRAMS

Reply refer to:

MINIMAGEN ENGINEERING .ESTERN SERVICE DEPT.

DOUGLAS R. STEELE Deputy Director

MARTIN D. FINN, M.D., M.P.H. Medical Director

November 19, 1985

2615 South Grand Avenue, Room 607 Los Angeles, CA 90007 (213) 744- 3223

Mr. Paul Schatz General Electric Company 1390 South Main Street Walnut Creek, CA

\$ 10 W

Dear Mr. Schatz:

ASSESSMENT AND MITIGATION OF PCB AND FURAN CONTAMINATED AREA ENDURA METAL PRODUCTS, 6900 STANFORD AVENUE, LOS ANGELES

We have reviewed your decontamination plan dated July, 1985 for off-site areas and have reviewed analytical data for dibenzofuran contamination both on and off site at the above subject facility. The following information and requirements are provided.

In your July, 1985 off-site decontamination plan you proposed removing and disposing of all soil with PCB levels in excess of 50 ppm. The 50 ppm decontaminations standard previously used for general areas and even the 7 ppm standard once used as a decontamination standard for sensitive areas are no longer validecontamination criteria. According to representatives of the State Department of Health Services (DOHS) Toxic Substances Control Program and Epidemiological Studies Section, PCB contaminated areas must be cleaned to background levels or to a safe level determined by following procedures found in a draft document titled "California Site Mitigation Decision Tree", produced by the State DOHS Alternative Technology and Policy Development Section.

In reviewing the above mentioned dibenzofuran analytical data submitted by Brehnm Laboratory and UMEA University Laboratory, it is the opinion of both the State DOHS and this Department that excessive levels of polychlorinated dibenzofurans exist on and off site soils, dusts, and wood. You are directed to take the following actions by the dates specified.

Mr. Paul Schatz General Electric Company November 19, 1985 Page 2

- 1. By January 6, 1986, in the off site contaminated areas, provide an impermeable protective cover to prevent a further migration from the area of contamination and to prevent any human contact with the contaminated soils. Provide this office by <u>December 16, 1986</u>, a plan to accomplish this temporary hazard mitigation activity.
- 2. By December 16, 1985, provide this office with a sampling plan to determine residual PCB; 2,3,7,8 TCDF and 2,3,7,8 TCDD contamination of on and off site areas. This plan shall include but not be limited to sampling of the following materials.
  - a) on and off site soils and dusts
  - b) on site woods, cement, brick and asphalt
  - c) equipment, raw materials and products on site at the time of sampling
- 3. By January 15, 1986, implement the above approved sampling plans and report analytical results to this office by March 15, 1986.

If you have any questions regarding this letter, please contact Larry Bishop or Ron Jensen at 213/744-3223.

Very truly yours,

Anastacio G. Medina, Chief

Hazardous Waste Control Program

AGM: bp

cc: John Scandura, DOHS
Bob Stevens, DOHS
Jerry Neisler, Cal/OSHA
Jim Suhrer, EPA
Hank Yacoub, RWQCB

FAIRFIELD CONNECTICUT 06431

MACDONALD ENTAL ISSUES RESOLUTION (203) 373-3317

April 1, 1985

Lawrence Bishop
Junty of Los Angeles
Jepartment of Health Services
313 North Figueroa Street
Los Angeles, CA 90012

Dear Mr. Bishop,

This letter is in response to the official notice of violation concerning the premises at 6900 Stanford Avenue in Los Angeles, issued by your office on March 18, 1985, and received by GE on March 21.

As you know, the floors of both buildings were cleaned on March 30 and 31, to remove dust from areas found to contain PCBs as the result of sampling conducted with your participation on January 22, 1985. We believe we have complied with the first item on the notice of violation.

The other items pose some problems for us, first because the dates for compliance you have proposed are upon us, and secondly, because we need clarification on some of the specific actions you have directed us to take.

When we met with you on February 28, we explained that our first priority is to find out where the PCBs came from that were found on the floors of the buildings late in January. We told you then that extensive sampling of soils in the area along the railroad right of way behind the plant had been done. We now have the results of that sampling, and the results show PCB levels as high as 2000 ppm in areas previously excavated and filled with clean soil. Since this result is totally unexpected and thus far unexplainable - we decided to send some of the retained samples to a second laboratory for verification. As this is written, we do not yet have the results, but we expect to have them shortly.

In light of this new information, it is not possible to develop a meaningful decontamination plan, which will solve this problem once and for all, until considerable additional sampling has been completed. Several weeks will be required to carry out this work.

We would like to meet with you during the week of April 15, for a number of purposes.

First, we will give you our report of the results of the extensive soil sampling done in January and February.

Mr. Lawrence Bishop Page Two April 1, 1985

Second, we would like to discuss with you a number of questions arising from the wording of the notice of violation where clarification will be helpful to us in formulating a decontamination plan.

For example, you have requested removal of "all PCB contaminated materials." In our prior cleanup work, you had agreed with us that 50ppm is an acceptable cleanup level, for soils and loose dirt, and we request confirmation that this prior agreement is still in effect. Also, you had agreed with us last year that a wipe test is an acceptable measure of adequacy of cleanup for floors, walls, and certain paved areas. During our discussion on February 28, you mentioned that the wipe test might not be the most appropriate measure. We request clarification on this point.

In the second item in the notice, you have requested "removal and disposal of all PCB contaminated materials on and offsite." This request is too open ended, in our view, and we request a clearer statement of what you have in mind by "offsite."

Finally, we would like to discuss with you our plans for further work, which we are now addressing concurrent with our review of the results of the recent sampling.

We believe we have responded diligently and responsibly to all the directives concerning PCBs at the Stanford Avenue site issued by your office in the past, and we look forward to continuing to work cooperatively with you in the future.

Very truly yours,

BIM/a

cc: SP Read

PC Schatz

WP Thornton, Jr.

# DISCUSSION TOPICS LOS ANGELES COUNTY DEPT. OF HEALTH SERVICES MARCH 28, 1986

#### **Historical**

- Brown & Cauldwell Activities
- Med-Tox Activities
- Bechtel Activities
  - Exterior Cleaning
  - Interior Cleaning
  - Verification Sampling
  - RR Sampling (Phases I & II)
  - Dioxin Analysis
  - RR Remedial Action Plan (Revision 0)

#### Ongoing Activities

- Interior Air Sampling (Preliminary findings)
- Underground Tank
- Interim RR Action
- Overall Project Planning

#### Action Items

- Railroad
- Facility



To: Bill Thornton

MAR 2 2 1985

W.P. THURNTON, Jr



# OFFICIAL NOTICE OF VIOLATION NO055481

County of Los Angeles Department of Health Services
Community Health Services Environmental Management

		Community Health Bervices	Environmental Management
torrice vocates]			3 luler
TO GOVERAL BLECTRIC COM	Dany Alla Paul	ADDRESS 1390 South	7 /15/85 Main St. Walnut Creek, CA9454
SUBJECT EUDIRA PLEAL PRODUCT	3 rate	ADDRESS 6700 STANFOR	20 AV. LOS Augeles
Bocause of a recent !	iscover- of PCB	Contamination of The	above subject facility, you
ar directed to take t	he following	action:	
1. By April 1, 1985 Rem	we and lagell	edispose of all mate	erials contaminated with PCR's
in Tota buildings one	lubich are sub	cet to disrubtion and	extrained By air.
7 Ru Ancil 1 1735 Predic	do this office	a decestar instian	plan for the temored + diposol
of all DCB contamineted	neterial en e	-doffsite (xa. 1xosle	red by 194/1185
2 R. April 8 1185 Acmin	d. This office of	report of the sound	ing and analysis of the fullowing
Sec PC R continu	mation! 6) A	Hundramy Storage Co	stances on the paperty
Circle ding 10 ambable to	uko attu sut	Acres way b) all s	ub floor polac boxes and pils in
et sue it Slob c) Co	state of all un	used und farmed P. D.	nglincly Ling that from South Tower
11 Run Ma. 15 1985 Bradie	this Office a la	horatory report varifying	a the above mentioned eleaned.
This perior shall be complied with as reas	aired by: EState Healti	h and Safety Code, Mi California	Administrative Code, Valos Angeles
County Ordinance No. 7583,		_City Ordinance No	Other Code
CORRECTION DATE APRIL 19	85		LES COUNTY MEALTH OFFICER
CONNECTION ON IELICAL			my bight
MECRIARD BA	Demons	•v	Inval of
99-777 (CRV. A/75)	MAN VIOLATOR;	Commy - SANITARIAN; Fint - DIST	RICT DIRECTOR)

0 x 434-5016



213 NORTH FIGUEROA STREET + LOS ANGELES, CALIFORNIA 50012

## PUBLIC HEALTH PROGRAMS

Reply refer to: 2615 South Grand Avenue, Room 807 Los Angeles, CA 90007
Date: March 18,1985
ERA METAL Products ADDRESS: 6900 STANFORD AV LA.  ADDRESS:
the total to correct the following violations of the State Health and
/ Palifornia Acministrative code market transfer
Discontinue immediately the disposal of hazardous wastes ( Standard Steel Warter ) to unauthorized locations ( Track by
Discontinue immediately the transport of hazardous wastes (
under manifest and to a State Health Department permitted facility.
Remove and legally dispose by 4/1/95, all hazardous wastes contaminated materials discharged to / stored at INTERIORS OF THE ENTENDED
(NOTE: All hazardous waste transported off-site by vehicle must be transported that the Hazardous Waste Manifest, by a State Health Department registered has the Health Registered has
Provide this office by, a decontemination plan for shove subject contaminated area.
Provide this office by, a photo copy of the complet manifest used to dispose of the above subject waste.
Store by, all hazardous waste in a secure, contained weather proof and well posted manner pursuant to California Administrative Code, Title 22, Section 66535.
Store by, all hazardous waste in non-leaking, proper labeled and dated containers with tight fitting lids.
Discontinue the treatment of hazardous waste / storage of hazardous waste for longer than without written permission from the State Depart of Health Services (213) 620-2380.
Maintain copies of all hazardous waste manifests and receipts at the above subject facility for agency review.
Obtain an EPA Number from the State Department of Health Services (916) : prior to transport of any hazardous waste off site.
Additional Requirements

7

P. 0 /1 Rich





TOTA 313 NORTH FIGUEROA STREET • LOS ANGELES, CALIFORNIA 90012

MAN \$ 1985 PUBLIC HEALTH PROGRAMS

STERN SERVICE DEPT-

DOUGLAS R. STEELE Deputy Director

MARTIN D. FINN, M.D., M.P.H. Medical Director Reply refer to: 2615 South Grand Avenue, Room 607 Los Angeles, CA 90007 (213) 744- 3223

January 18, 1985

Mr. Paul C. Schatz, Manager Stanford Avenue Project General Electric Company 1390 South Main Street Walnut Creek, California 94596

Dear Mr. Schatz:

RESIDUAL PCB CONTAMINATION AT ENDURA METAL PRODUCTS 6900 STANFORD AVENUE, LOS ANGELES

As a result of our letter to you dated November 21, 1984, and your conversation with Larry Bishop of this office, General Electric Company was given a time extension to January 15, 1985, to decontaminate the south and east driveways and the storm drain between the buildings at the above subject site. You and Mr. Bishop agreed that the remaining contaminated areas (PCB impregnated areas #1, #2, #3, and #4, specified in our November 21, 1984, letter) should await further site characterization and mitigation activities to be conducted by the General Electric Company.

You are directed to provide this office by February 28, 1985, a site characterization report which delineates the vertical and horizontal extent of residual PCB contamination at the above subject site. The areas most suspect of containing this residual contamination are as follows:

- 1) The concrete floor of the front (west) building.
- The brick walls of the front building.
- The concrete floor or access way from the front building bisecting the rear (east) building and leading to the east driveway.
- 4) The asphalt area at the southwest corner of the north parking lot.



313 NORTH FIGUEROA STREET • LOS ANGELES, CALIFORNIA 90012

Nov 2 1984

#### **PUBLIC HEALTH PROGRAMS**

DOUGLAS R. STEELE Deputy Director

MARTIN D. FINN, M.D., M.P.H. Medical Director

Reply refer to: 2615 South Grand Avenue, Room 607 Los Angeles, CA 90007 (213) 744- 3 2 2 3

November 21, 1984

Mr. Paul Schatz, Manager Stanford Avenue Project General Electric Company 1390 So. Main Street Walnut Creek, California 94596

Dear Sir:

RESIDUAL PCB CONTAMINATION ENDURA METAL PRODUCTS 6900 STANFORD AVENUE, LOS ANGELES, CA

Verification sampling conducted by Larry Bishop of this office and your contractor, Brown and Caldwell Company, in August and September, 1984, revealed the following residual contamination still existing at the above subject site:

	AREA	DATE SAMPLED	PCB LEVEL
1)	front building - northeast quadrant floor (core 1B floor) composite 4 - 1" cores	8/20/84	<b>270 m</b> g/kg
2)	<pre>front building - northeast quadrant wall (core 2B wall) composite 4 - 1" cores</pre>	11	1300 mg/kg
3)	floor - center of both buildings (core 1A - 58 floor) composite 4 - 1" cores	11	3300 mg/kg
4)	Asphalt – southwest corner of north parking lot (5B)	9/13/84	<b>89</b> mg/kg
5)	South and east driveways composite surface (LB 9 - 13F)	Ħ	<b>73</b> 4 mg/kg
6)	Storm drain sludge-breézeway between buildings (LB 9 - 13G)		186 mg/kg

Mr. Paul Schatz, Manager November 21, 1984 Page 2

General Electric Company is directed to decontaminate areas #4, #5, and #6, and any adjacent contaminated areas by December 23, 1984. Provide this office, by December 31, 1984, verification from a State certified laboratory of decontamination of areas #4, #5, and #6. A representative of this office must be present during verification sampling.

The oversight of characterization and mitigation activities in areas #1, #2, and #3 will be conducted in coordination with the U.S. Environmental Protection Agency. That agency is now reviewing their role in regards to the mitigation of these areas.

If you have any questions about their review, please contact Steve Johnson at (415) 974-7512.

If you have any questions about this letter, please contact Larry Bishop at (213) 744-3223.

Very truly yours,

Anastacio G. Medina, Chief

Hazardous Waste Control Program

AGM:LB:s

cc: Steve Johnson - Environmental Protection Agency Harry Sneh - State Department of Health Services Tom Bell - Regional Water Quality Control Board





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#### **PUBLIC HEALTH PROGRAMS**

DOUGLAS R. STEELE Deputy Director

MARTIN D. FINN, M.D., M.P.H.
Medical Director

Reply refer to: 2615 South Grand Avenue, Room 607 Los Angeles, CA 90007 (213) 744- 3223

MAY 25 1984

May 21, 1984

Mr. Paul C. Schatz Manufacturing and Engineering Support General Electric Company 1390 South Main Street Walnut Creek, CA

Dear Mr. Schatz:

DECONTAMINATION OF PCB CONTAMINATED AREAS 6900 STANFORD AVENUE, LOS ANGELES, CA

This office approves of your decontamination plans for the above subject facility. We understand that these plans are subject to change in order to assure complete decontamination of the affected facility and the nearby railroad property.

It is imperative that this cleanup be completed as soon as possible, especially prior to the start of Olympic activities. We urge General Electric to obtain the necessary railroad permits and begin excavation activities soon. As agreed upon at our April 24th meeting, cleanup activities will begin the first week of June 1984.

If you have any questions regarding this letter, please contact Larry Bishop at (213) 744-3223.

Very truly yours,

Anastacio G. Medina, Chief

Hazardous Waste Control Program

LB:bp

cc: Mr. Harry Sneh, State DOHS, Toxic Substance Division

Ms. Laurel Chun, EPA Enforcement Section

Mr. Tom Bell, Regional Water Quality Control Board

Mr. Paul C. Schatz May 21, 1984 Page 2

cc: M. Norm Cotter, L.A. City Bureau of Sanitation Research and Planning Division
Mr. Don J. Skaff, Southern Pacific Transportation Co.





313 NORTH FIGUEROA STREET • LOS ANGELES, CALIFORNIA 90012

#### **PUBLIC HEALTH PROGRAMS**

DOUGLAS R. STEELE Deputy Director

MARTIN D. FINN, M.D., M.P.H. . Medical Director

Reply refer to: 2815 South Grand Avenue, Room 607 0.8 1984 (213) 744- 3223

May 2, 1984

Mr. Paul C. Schatz Manufacturing & Engineering Support General Electric Company 1390 South Main Street Walnut Creek, California

SUBJECT: DECONTAMINATION OF RAILROAD TRACK

AREA CONTAMINATED WITH PCB'S AT

6900 STANFORD AVENUE, LOS ANGELES, CA

Dear Mr. Schatz:

Thank you for taking the time to meet with Larry Bishop of this office on April 24, 1984, to review the request for proposal for the decontamination of the above subject property. At this meeting, you indicated to Mr. Bishop that General Electric did not intend to decontaminate soil beneath the Southern Pacific track area. You also stated that a health risk was not believed to exist since any remaining PCB contamination in that area would be interred. You also questioned whether or not that particular contamination was caused by General Electric or Southern Pacific equipment.

As we and other agencies have stated at previous meetings with you, and as indicated in our letter to you of December 27, 1983, all contaminated areas must be decontaminated to a level of less than 50 ppm PCB. The December 27, 1983, letter also stated that you should plan for and obtain railroad permits for excavation below the tracks because of indications that high levels of PCB's, contiguous with fence line contamination exist beneath the track area. In that letter, we also stated that all contaminated railroad ties be properly disposed of. If this contamination exists, disruption of the track area is unavoidable.

Please be advised that our representative on site will require excavation of the track area if excessive PCB levels are found, whether or not General Electric or its contractors are prepared, at the time of decontamination activities, to excavate that area. As stated in our letter of December 27, 1983, our representative at the site reserves the right to direct verification sampling of suspect areas including the track area.

Mr. Paul C. Schatz May 2, 1984 Page 2

You indicated at the April 24, 1984, meeting that the clean-up contract should be let by mid-May, 1984; decontamination activities would begin by June 1, 1984, and that work would be completed within 45 days, (mid-July).

We look forward to working with you and your contractors in decontamination the affected site within this time schedule. Please contact me or Larry Bishop at (213) 744-3223, if you have any questions about this letter or our policies.

Very truly yours,

Anastacio G. Medina, Chief Hazardous Waste Control Program

AGM:LB:s

cc: Mr. Harry Sneh, State DOHS

Ms. Laurel Chun, EPA

Mr. Gerald Neisler, Cal OSHA

Mr. Tom Bell, Regional Water Quality Control Board

Mr. Norm Cotter, L.A. City Bureau of Sanitation

# GENERAL & ELECTRIC

APPARATUS AND ENGINEERING SERVICES
GENERAL ELECTRIC COMPANY ● ONE RIVER ROAD ● SCHENECTADY, NEW YORK 12345

Building 2 - 706 (518) 385-3720

November 1, 1983

United States Environmental Protection Agency Region IX 215 Fremont Street San Francisco, California 94105

ATTN: Harry Seraydarian

Director of Toxics & Waste Management Division

Your Reference;

T-3-2 T(83)E177

Dear Sir:

I attach a copy of the responses of General Electric Company to the questions propounded in your letter of October 26, 1983. If you wish to contact us further with regard to this site, please contact me directly. My name, address and phone number are set forth below:

William P. Thornton, Jr. General Electric Company One River Road, Building 2-714 Schenectady, New York 12345 (518) 385-3720

Very truly yours,

William P. Thornton, Jr.
Department Counsel
Central Service Department

WPT:cma

attachment

bcc: P. Schatz

B. McDonald

- 1. The only evidence of the release available to General Electric Company is the presence of substances in the soil and elsewhere on the premises.

  General Electric Company has no knowledge of the time and date of any release. General Electric Company has never owned the premises but did lease the premises between 1946 and 1971 and during that period operated as apparatus repair facility on the site.
- 2. The site is located at 6900 Stanford Avenue, City of Los Angeles, County of Los Angeles, State of California. Precise areas of discovery of substances are identified in Exhibit A. Site Investigation and Correction Plan, Stanford Avenue Site, Los Angeles, California October, 1983.
- The types of "hazardous substances" found on the premises and their concentrations appear in Exhibit A.
- 4. Unknown.
- 5. Unknown.
- 6. No clean-up measures have been instituted; proposed clean-up measures appear in Exhibit A.
- 7. Unknown.
- 8. During the period 1946-1971, the Operator was:

General Electric Company
One River Road
Schenectady, New York 12345

The Owner was:

At the present time the operator is:

Endura Metal Products, Inc. 6900 Stanford Avenue Los Angeles, California

Except as set forth in this answer, General Electric Company does not know the answer to the question.

9. General Electric Company-a New York corporation

Endura Metal Products, Inc.-organization unknown.

- 10. The release was not detected at any time; the presence of the substance on the premises was detected by the Los Angeles County Health Department and reported to General Electric Company by letter dated April 4, 1983.
- 11. See Exhibit A.
- 12. General Electric Company knows of no notfications.
- 13. General Electric Company knows of no such persons.
- 14. County of Los Angeles Department of Health Services
  U.S. Environmental Protection Agency



### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**REGION IX** 

215 Fremont Street San Francisco, Ca. 94105

> CERTIFIED MAIL NO. 0416324 RETURN RECEIPT REQUESTED

In Reply T-3-2 Refer to: T(83)E177

October 26, 1983.

Paul C. Schatz
Mngr. - Manufacturing Support
Apparatus and Engineering Services
General Electric Company
1390 South Main Street
Walnut Creek, CA 94596

OCT 27 1983

Dear Mr. Schatz:

This Agency has received information concerning a release of a hazardous substance into the environment. Our information indicates that the release took place in or near 6900 Stanford Ave., City of Los Angeles, County of Los Angeles, State of California and reportedly occurred over a period of time beginning on or about 1946 and continuing to the present time from a facility which you own or operate.

Under the provisions of Section 104 of the Comprehensive, Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. 9604, and Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6927, as amended by the Solid Waste Disposal Act Amendments of 1980, the Administrator of the Environmental Protection Agency has the authority to require any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes and substances to furnish information related to such wastes and substances. Pursuant to these statutory provisions, you are hereby requested to provide the following information:

- 1. The time and date of the release;
- 2. The specific location of the release (include county);
- 3. The type of hazardous substance(s) released (include chemical composition concentration);

- 4. The quantity of hazardous substance(s) released;
- 5. The cause of the release (in detail);
- 6. The clean-up measures, if any, undertaken by your company (include methods of disposal);
- 7. The flow path of the hazardous substance(s) released (including but not limited to receiving water, storm drain, sewer system, etc.)
- 8. The name and address of the owner/operator of the facility from which the release occurred;
- 9. The legal description of the owner/operator of the facility from which the release occurred (i.e., corporation, or sole proprietorship; include statutory agent and State of incorporation if applicable)
- 10. The time and date the release was detected by the owner/operator of the facility from which the release occurred;
- 11. Any and all information resulting from studies, tests, or test results performed by your firm; and information resulting from such studies or tests conducted or contracted by your firm. (Include contractor names and dates of studies).
- 12. The federal and State agencies, if any, that the owner/ operator notified of this release (include the time and date of these notifications);
- 13. The names and addresses of persons, including but not limited to employees, who have first-hand knowledge of the release and the subsequent cleanup measures. State the names of local agencies notified, and names of persons contacted;
- 14. The Federal and State agencies, if any, which investigated the discharge.

The information requested herein must be provided notwithstanding its possible characterization as confidential or trade secret information. EPA regulations governing confidentiality of business information are set forth in Part 2,

Subpart B of Title 40 of the Code of Federal Regulations. For any portion of the information submitted which is entitled to confidential treatment, you may assert a confidentiality claim in accordance with 40 CFR §2.203(b). If EPA determines that the information so designated meets the criteria set forth in 40 CFR §2.200, the information will be disclosed only to the extent, and by means of the procedures, specified in 40 CFR Part 2, Subpart B. EPA will construe the failure to furnish a confidentiality claim with your response as a waiver of the claim and information contained in the response may be made available to the public by EPA without further notice.

Your answers to the above questions must be sent to EPA within fourteen (14) calendar days of your receipt of this letter. Under Section 106 of CERCLA, 42 U.S.C. 9606, and Section 3008 of RCRA, 42 U.S.C. 6928, failure to comply with this request may result in an order requiring compliance or a civil action for appropriate relief. Section 106 of CERCLA and Section 3008 of RCRA also provide for civil penalties.

If you have any questions concerning this matter, please contact Daniel A. Horgan at (415)974-8368.

Your cooperation in this matter is appreciated.

Sincerely yours,

Caul D. Blas

Harry Seraydarian
Director
Toxics & Waste Management Division

Enclosures: Sections 104 & 106 of CERCLA Section 3007 & 3008 of RCRA



### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street San Francisco, Ca. 94105

> CERTIFIED MAIL NO. 0416324 RETURN RECEIPT REQUESTED

In Reply T-3-2 Refer to: T(83)E177

October 26, 1983.

Paul C. Schatz
Mngr. - Manufacturing Support
Apparatus and Engineering Services
General Electric Company
1390 South Main Street
Walnut Creek, CA 94596

OCT 27 1983

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- The time and date of the release;
- The specific location of the release (include county);
- 3. The type of hazardous substance(s) released (include chemical composition concentration);

- The quantity of hazardous substance(s) released;
- 5. The cause of the release (in detail);
- 6. The clean-up measures, if any, undertaken by your company (include methods of disposal);
- 7. The flow path of the hazardous substance(s) released (including but not limited to receiving water, storm drain, sewer system, etc.)
- 8. The name and address of the owner/operator of the facility from which the release occurred;
- 9. The legal description of the owner/operator of the facility from which the release occurred (i.e., corporation, or sole proprietorship; include statutory agent and State of incorporation if applicable)
- 10. The time and date the release was detected by the owner/operator of the facility from which the release occurred;
- 11. Any and all information resulting from studies, tests, or test results performed by your firm; and information resulting from such studies or tests conducted or contracted by your firm. (Include contractor names and dates of studies).
- 12. The federal and State agencies, if any, that the owner/ operator notified of this release (include the time and date of these notifications);
- 13. The names and addresses of persons, including but not limited to employees, who have first-hand knowledge of the release and the subsequent cleanup measures. State the names of local agencies notified, and names of persons contacted;
- 14. The federal and State agencies, if any, which investigated the discharge.

The information requested herein must be provided notwithstanding its possible characterization as confidential or trade secret information. EPA regulations governing confidentiality of business information are set forth in Part 2,

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If you have any questions concerning this matter, please contact Daniel A. Horgan at (415)974-8368.

Your cooperation in this matter is appreciated.

Sincerely yours,

Caul D. Blas

Harry Seraydarian
Director
Toxics & Waste Management Division

Enclosures:

Sections 104 & 106 of CERCLA Section 3007 & 3008 of RCRA





313 NORTH FIGUEROA STREET • LOS ANGELES, CALIFORNIA 90012

#### **PUBLIC HEALTH PROGRAMS**

DOUGLAS R. STEELE Deputy Director

MARTIN D. FINN, M.D., M.P.H. Medical Director Reply refer to: 2615 South Grand Avenue, Room 607 Los Angeles, CA 90007 (213) 744-3223

. April 22, 1983

RECEIVED

MAY 21983

Mr. Paul Schatz General Electric Company 55 Hawthorne Street San Francisco, California 94105

W.P. THORNTON. Jr

Dear Sir:

POLYCHLORINATED BIPHENOL CONTAMINATION AT A FORMER GENERAL ELECTRIC FACILITY, 6900 STANFORD AVENUE, LOS ANGELES, CALIFORNIA 90001

In response to your request for additional information contained in an anonymous letter sent to the Environmental Protection Agency dated January 19, 1983, regarding the above subject matter, the following information is provided.

From February, 1946, to December, 1971, a General Electric Apparatus Repair Service Shop located at the above subject address processed several thousand 10c oil and pyranol filled transformers. Standard procedure called for used oils to be pumped from the transformers and disposed of by various vendors. However, smaller 10 to 50 gallon units were often dumped out primarily at the edge of a steam cleaning platform which bordered the railroad property behind the shop. Some units were up-ended along the length of the chain link fence separating the two properties.

The author of the letter presumed that if a minimum of 100 gallons of oil per week was dumped in this manner, then 100 gallons x 52 weeks x 25 years = 130,000 gallons of oil was dumped. If half of the oil was pyranol, then a minimum of 65,000 gallons of PCB's were dumped out.

The author further states that PCB's were not considered hazardous at the time of disposal, but that because the PCB's contain dioxin, he or she presumes that the ground water supply for Los Angeles is contaminated with this material. This letter was sent to Ann Gorsuch of the E.P.A. with a copy sent to Los Angeles City Mayor Tom Bradley.

Mr. Paul Schatz April 22, 1983 Page 2

We look forward to working with you or your representative in the near future to implement a prompt decontamination of the affected areas. We anticipate receiving a written clean-up plan from General Electric Company within the next ten (10) days. Although our memorandum of understanding with the State Department of Health Services specifies that our Department is the sole enforcement agency in this type of clean-up action, we will elicit comment on your plan from both the State Department of Health Services and the Regional Water Quality Control Board prior to approving the plan. If you wish, you are welcome to send copies of this plan directly to these agencies. We suggest you send these copies to:

Mr. John Hinton
Department of Health Services
Hazardous Waste Management Branch
107 S. Broadway, Room 7128
Los Angeles, California 90012

Mr. David Gildersleeve Regional Water Quality Control Boar 107 S. Broadway, Room 4027 Los Angeles, California 90012

If you have any further questions regarding this letter, please contact Larry Bishop at (213) 744-3223.

Sincerely,

R. J. Dennehine

R. L. Dennerline, Chief Occupational Health

RLD:LB:s

cc: William Thorton
General Electric Company
1 River Road, Bldg. 2/706
Schenectady, New York 12345



Dits

313 NORTH FIGUEROA STREET . LOS ANGELES, CALIFORNIA 90012

#### PUBLIC HEALTH PROGRAMS

AS R. STEELE.

N.D. FINN, M.D., M.P.H.

Reply refer to: 2615 South Grand Avenue, Room 607 Los Angeles, CA 90007 (213) 744-3223

April 4, 1983

Mr. Dick Papp Apparatus Service Shop 3601 E. La Palma Avenue Anaheim, California 92808

Dear Sir:

POLYCHLORINATED BIPHENOL (PCB) CONTAMINATION OF A FORMER GENERAL ELECTRIC COMPANY FACILITY, 6900 STANFORD AVENUE, LOS ANGELES

On March 8, 1983, a representative of this office inspected the above subject facility in response to information brought to our attention that large quantities of PCB transformer liquid were disposed of at the rear of this facility from 1946 to 1971. On this date and on subsequent inspections of the affected area on March 15 and March 17, 1983, soil and liquid samples were taken at and around a steam cleaning sump opposite the back door to the building. Laboratory analysis of these samples revealed PCB levels ranging from 13 parts per million (ppm) to 1,290 ppm.

The State Department of Health Services defines contaminated materials containing PCB's at a concentration of 50 ppm or greater as a hazardous waste. The improper disposal and improper storage or abandonment of a hazardous waste is a violation of the California Hazardous Waste Control Law.

- 1. You are hereby directed to remove and legally dispose of all materials contaminated with PCB's at the above subject site by May 10, 1983.
- 2. Provide this office, for departmental approval, by April 20, 1983, a plan for decontamination of the above subject site which includes the following items:

- a) The date that sampling and clean-up activities will begin at the site;
- The names and addresses of companies contracted to analyze, decontaminate and transport wastes from the above subject site;
- c) The methods to be used to decontaminate the affected area;
- d) The location of the disposal site;
- e) The date, after clean-up is complete, that sampling will take place to verify decontamination of the site.
- 3. Profice this office by May 20, 1983, a report from a State certified laboratory indicating the decontamination of the site to legal limits and completed copies of all hazardous waste manifests used during the transport and disposal of the contaminated materials.

If you have any questions regarding this notice, please contact Larry Bishop of this office at (213) 744-3223.

Yours truly,

R.J. Denului

R. L. Dennerline, Chief Occupational Health

RLD:LB:s